

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**TAYLOR PLAINTIFFS' APPLICATION FOR ATTORNEY FEES**

Plaintiffs La Union del Pueblo Entero (LUPE), Lenard Taylor, Eulalio Mendez, Jr. Lionel Estrada, Estela Garcia Espinosa Maximina Martinez Lara (Taylor Plaintiffs) move this Court for an award of attorney fees and costs. This was an action seeking redress for violations of Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, as amended in 2006. Plaintiffs are prevailing parties in this action and are entitled to fees and costs as authorized both by the Voting Rights Act, 52 U.S.C § 10310(e), as amended in 2006, and by 42 U.S.C. § 1988.

Specifically, Plaintiffs and their attorneys, including Jose Garza, Marinda van Dalen and Robert Doggett<sup>1</sup> presented pleadings, documentary evidence, witness testimony, and argument to this Court, challenging the 2011 voter photo-ID provisions enacted by the State of Texas (commonly called SB 14). Ultimately the Court enjoined the challenged enactment and imposed a

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<sup>1</sup> The Taylor Plaintiffs also relied on the assistance of other TRLA staff attorneys, including Peter McGraw, Priscilla Noriega, Kathryn Newell, and Kathryn Youker. The Taylor Plaintiffs also relied on the services of TRLA paralegals including Kathleen Griesbach. These individuals assisted with research, client outreach and other valuable services. However, in the exercise of billing judgment the Taylor Plaintiffs are not requesting fees for these individuals' work.

remedy because of violations of Section 2 of the Voting Rights Act, found by this Court and affirmed by the *en banc* Fifth Circuit. A review of the entire record shows that Plaintiffs' prevailed in this action and qualify for a reasonable fee award under law.

### **FACTUAL BACKGROUND**

In 2011, Texas passed Senate Bill 14, which required individuals to present one of a limited set of acceptable forms of photo identification to vote. *See* Act of May 16, 2011, 82d Leg., R.S., ch. 123, 2011 Tex. Gen. Laws 619. SB 14 was initially blocked by the Voting Rights Act's preclearance mechanism. *See Texas v. Holder*, 888 F.Supp.2d 113 (D.D.C. 2012). On June 25, 2013, after the Supreme Court decided *Shelby County, Alabama v. Holder*, Texas began enforcing SB 14. Shortly thereafter, the Taylor Plaintiffs filed this action challenging the law under the First, Fourteenth, and Amendments to the United States Constitution and Section 2 of the Voting Rights Act of 1965,<sup>2</sup> as well as various Texas constitutional provisions. The Taylor Plaintiffs alleged, *inter alia*, that SB 14 was enacted with a racially discriminatory purpose, had racially discriminatory results on Hispanic and African American voters, and placed an undue burden on their fundamental right to vote.

Substantial pretrial issues were raised during the months following the filing of this action. The State for example filed a motion to dismiss and challenged Plaintiff's standing in this case. The Taylor Plaintiffs successfully opposed these efforts.

The Taylor Plaintiffs presented witnesses, an expert witness, exhibits and arguments that demonstrated the real personal injury cause by SB 14 and this Court cited to that testimony in her opinion. *See Veasey v. Abbott*, 71 F. Supp. 3d 627, 667-678 (S.D. Tex.

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<sup>2</sup> Although Plaintiffs presented differing legal theories, all private Plaintiffs, including the Taylor Plaintiffs, raised a common Section 2 discriminatory-results cause of action and prevailed on that claim, thus achieving their common goal of enjoining SB 14's enforcement against voters who lack the requisite photo-ID

2014)(e.g. describing the financial burden imposed by the requirements: “Some Plaintiffs testified that they were either unable to pay or that they would suffer a substantial burden in paying the cost associated with getting a qualified SB 14 ID or the necessary underlying documents. Mr. Mendez testified about his family’s “very sad” financial state, explaining that “[e]ach month by the last week there’s no food in the house and nothing with which to buy any, especially milk for the children. Then my wife has to go to a place to ask for food at a place where they give food to poor people.” Mr. Mendez was embarrassed to admit at trial that having to pay for a new birth certificate was a burden on him and his family. Mr. Lara described his financial situation by stating that “we got each our little ... small amount of cash ... and we try to ... stretch it out as possible by the end of the month, and sometimes we’ll make it and sometimes we won’t.” Ms. Lara described her financial state as both difficult and very stressful.” *Veasey*, 71 F. Supp. 3d at 671-729(citations omitted)). Taylor Plaintiffs expert was also relied upon by the Court in its analysis of the impact of SB 4 on voters like the Taylor Plaintiffs. *See e.g. Veasey* 71 F. Supp. 3d at 668, n.272, and 705, n. 570.

After a nine-day bench trial featuring both live and deposition testimony from dozens of expert and lay witnesses, this Court issued a comprehensive opinion holding:

“It is clear from the evidence—whether treated as a matter of statistical methods, quantitative analysis, anthropology, political geography, regional planning, field study, common sense, or educated observation—that SB 14 disproportionately impacts African–American and Hispanic registered voters relative to Anglos in Texas.”

*Veasey*, 71 F. Supp. 3d at 695.

Pursuant to that opinion, the Court entered “a permanent and final injunction against enforcement of the voter identification provisions” of SB 14 and directed the State to “return to

enforcing the voter identification requirements for in-person voting in effect immediately prior to the enactment and implementation of SB 14.” *Id.* at 707.

Texas appealed. The Fifth Circuit panel affirmed this Court’s finding that SB 14 had discriminatory results in violation of Section 2 and remanded for consideration of the proper remedy. *Veasey v. Perry*, 796 F.3d 490, 493, 498 (5th Cir. 2014). The State filed a petition for rehearing en banc, which was granted. *Veasey v. Abbott*, 815 F.3d 958 (5th Cir. 2016). Upon rehearing, the full Fifth Circuit again affirmed this Court’s finding that SB 14 violated Section 2 because of its discriminatory results and remanded to this Court to determine the appropriate remedy. *Veasey v. Abbott*, 830 F.3d 216, 272 (5th Cir. 2016) (en banc). The en banc court also vacated the discriminatory-intent finding and remanded for this Court to reweigh the evidence regarding that finding. *Id.* at 230. On September 23, 2016, the State sought a writ of certiorari. Private Plaintiffs opposed that petition, and on January 23, 2017, the Supreme Court denied the State’s petition.

On August 10, 2016, following the en banc Fifth Circuit’s instructions, this Court ordered interim relief for the November 8, 2016 election (as well as prior and subsequent state and local elections) directing, *inter alia*, the state and its election officials to accept several forms of identification in addition to those mandated by SB 14 upon the completion and signing of a reasonable impediment declaration by the voter. This relief remained in place until SB 14 was amended to largely incorporate this Court’s interim relief into state law. The Fifth Circuit held that this amendment did not moot the case but, by “essentially mirror[ing the] agreed interim order,” constituted an acceptable remedy under the Fifth Circuit’s 2016 ruling that SB 14 violated Section 2. *Veasey v. Abbott*, 888 F.3d 792, 804 (5th Cir. 2018).

## ARGUMENT

The Taylor Plaintiffs join in and adopt here the Memorandum in Support of Attorneys' Fees filed jointly by all Private Plaintiffs to this action.

In reviewing a motion for attorneys' fees in the Fifth Circuit, courts apply the "lodestar" method, which requires determination of: (1) the reasonable hourly rate for the attorneys who worked on the case; (2) the number of hours reasonably expended on the litigation by each attorney; and (3) adjustment of the amount based on a number of relative factors. *See Rouse v. Target Corp.*, 181 F.Supp.3d 379, 384 (S.D. Tex. 2016). The court begins by establishing the reasonable hourly rates and the number of hours reasonably expended; the court then calculates the "lodestar" amount by multiplying the reasonable hourly billing rate for each attorney by the number of hours reasonably expended on the litigation by that attorney. *Rouse*, 181 F.Supp.3d at 384; *Heidtman v. Cnty. of El Paso*, 171 F.3d 1038, 1043 (5th Cir. 1999).

## LODESTAR

Here, the Taylor Plaintiffs have provided the Court with detailed supporting declarations (attached exhibits 1, 2 and 3 - declarations for Jose Garza, Marinda van Dalen and Robert Doggett). These declarations provide a detailed accounting of the lawyers' qualifications and the hours devoted to this case. The Taylor Plaintiffs seek the following lodestar amount as prevailing party in this action:

Jose Garza <sup>3</sup>	472.9hrs.	x	\$613.00 =	\$289,887.70
Marinda Van Dalen <sup>4</sup>	1159hrs.	x	\$544.00 =	\$630,496.00

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<sup>3</sup> Attached Exhibit No. 1 is the Declaration of Jose Garza. This declaration includes exhibits detailing his qualifications as well as his daily time records. The declaration and its exhibits show that Mr. Garza devoted almost 800 hours to the prosecution of this case. Moreover, it shows a billing judgment reduction of over 300 hours, leaving 472.9 hours claimed.

<sup>4</sup> Attached Exhibit No. 2 is the Declaration of Marinda van Dalen. Her declaration includes exhibits detailing her qualifications, as well as her daily time records. The declaration and its

$$\text{Robert Doggett}^5 \quad 146.8\text{hrs.} \quad \times \quad \$572.00 = \quad \$83,969.60$$

These figures represent substantial billing reduction as detailed in the attached declarations submitted by each attorney. These figures total \$1,004,353.30 in attorney fees. As discussed in the Memorandum in Support of this Motion, Plaintiff is also entitled to the costs of litigation, including expert witness costs. In this case, costs included such items as filing fees, deposition costs, and travel expenses. The following are the reasonable costs associated with prosecuting this case:

Filing fee and process service fee:	\$590.00
Expert Expenses:	\$35,062.72
Travel expenses for client outreach and communication:	\$2,120.44
Travel expenses for depositions, ct. hearings and trial:	\$6,325.46
Other Trial Expenses (interpreter):	\$175.00
<b>TOTAL:</b>	<b>\$44,273.62</b>

These costs are detailed in Exhibits 4 and 5<sup>6</sup> to this Motion.

### **CONCLUSION**

Based on the foregoing and on the Memorandum of Facts and Law and the supporting declarations and exhibits included therein, the Taylor Plaintiffs respectfully request an award of attorneys' fees and costs for the success achieved in this cause.

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exhibits show that Ms. van Dalen devoted almost 1400 hours to the prosecution of this case. A billing judgment discount of over 230 hours has been applied, leaving 1159 hours claimed.

<sup>5</sup> Attached Exhibit No. 3 is the Declaration of Robert Doggett. His declaration includes exhibits that detail his qualifications and his daily time records. The declaration and exhibits detail a billing judgment discount of over 154 hours. Therefore, the Taylor Plaintiffs request an award of attorney's fees for 146.8 hours for Mr. Doggett's time in this case.

<sup>6</sup> Exhibits 4 and 5 were developed by Jose Garza as he describes in his declaration. He reviewed TRLA business records, kept in the regular course of business for this case under the supervision of Jose Garza, lead counsel for Taylor Plaintiffs, to develop the exhibits. Jose Garza is Litigation Director for TRLA.

DATED: April 11, 2019

Respectfully submitted,

/s/ Jose Garza

JOSE GARZA  
Texas Bar No. 07731950

**ATTORNEYS FOR TAYLOR  
PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2019 I electronically served the foregoing via ECF on all other parties in this litigation.

/s/ Jose Garza

**CERTIFICATE OF CONFERENCE**

I have conferred with counsel for Defendants, Mr. Matthew Frederick, and have been informed that Defendants oppose this motion.

/s/ Jose Garza

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**DECLARATION OF JOSE GARZA IN SUPPORT OF REQUEST  
FOR ATTORNEY'S FEES**

**Background and Prevailing Party**

1. I am lead-counsel for Plaintiffs, Taylor, et al., in the above-styled matter. My resume is attached hereto as Attachment No. 1. I am presenting this declaration in support of Taylor Plaintiffs Motion for Attorney's Fees and Costs. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 42 U.S.C. §1973l(e) as amended 2006. Specifically, Plaintiffs and their attorneys, including Jose Garza, presented pleadings, evidence, witnesses and argument to this and other Courts, challenging the 2011 voter photo ID provisions (commonly referred to as S.B. 14) enacted by the State of Texas pursuant to the Voting Rights Act. Ultimately the challenged enactment was enjoined and not implemented and a remedy imposed because of violations of Section 2 of the Voting Rights Act, found by this Court and affirmed by the *en banc* Fifth Circuit.

A review of Plaintiffs' pleadings, attachments and argument on this cause together with this Court's orders, including orders regarding the interim relief as well as final judgment demonstrate Plaintiffs' position as prevailing party in this action.

**Time**



2 My time in this case is kept contemporaneously with the work performed and usually recorded on a daily basis. During the course of this litigation and for the time period ending January 31, 2019, I devoted a total of 789.9 hours to assist with the preparation and prosecution of this action, including participating in the trial of this action. In the exercise of billing judgment, I am discounting or not billing for portions of my time to account, as noted in the time keeping exhibit attached hereto. Such discount is meant to account for any potential duplication of time with my co-counsel and to account for possible development of unrelated or unnecessary legal or factual issues. Therefore, I am requesting compensation for a total of 472.9 hours spent on the case. I have attached the time records that I maintained in this action, as Attachment No. 2.

3 There was no unnecessary duplication of efforts. My co-counsel on this case and I carefully coordinated our efforts so as to avoid unnecessary duplication. We carefully divided tasks and witness and exhibit development in a similar fashion and any overlap was minimal and necessary to avoid errors. Moreover, we consulted with each other in order to better coordinate the development of the case. The amount of time expended in this case was necessary because it presented several difficult questions of fact and law, as well as unsettled issues. Time spent in the days leading to the filing of this action were also necessary to protect TRLA's clients' interests and to properly prepare for what was expected to be a quick progression to trial. Yet, the bulk of Plaintiff's counsel's time in this cause was in the presentation of this case in this Court.

The time spent on this case represents the minimum hours necessary for an adequate preparation of pleadings, exhibits, and presentation to the court. Because of my forty-one years of experience in Voting Rights cases, I did not spend any unnecessary time on issues and evidence developed in this case, and I did not spend time on matters that were not relevant to the prosecution of this action. Although, some of the time I spent on this issue was for participating in the court case in Washington D.C., dealing with the Section 5 proceedings on the challenged legislation, such time is not billed in this case. However, some of the trial and discovery records produced in the D. C. litigation was reviewed in preparation for the presentation of evidence here. The Section 5 preclearance process was relevant to the preparation of this case for obvious reasons. Similar factual

records and arguments were part of the D. C. proceedings.

**Market Rate**

4 I have been a member of the Texas Bar for over 40 years. I am also a member of numerous federal court bars across the country. Throughout my career, my practice has focused on federal voting rights litigation. I have attached my resume as Attachment No. 1 to this declaration. In addition, the State of Texas stipulated that in 2001 the prevailing market rate for my time on voting rights cases was \$325.00 per hour. Eleven years later, in 2012 fees expert Mr. Rick Gray testified and in recent fees awards, the Courts have determined that my prevailing market rate was \$425.00 per hour, in less complicated and more limited Section 5 enforcement actions. *See Vasquez-Lopez v. Medina County, Texas* 11-cv-945, W.D. Tex., San Antonio Division, 2012; *Petteway et al., v. Galveston County*, 11-cv-511, S.D. Tex., Galveston Division, 2012. For this case, Plaintiffs ask that the Court adopt the USAO attorney's fees matrix, for 2015-2019 in light of recent fee awards in the Southern District of Texas, which are similar to the matrix index. Based on this matrix I am asking to be compensated at a rate of \$613.00 per hour.<sup>1</sup> Based on my knowledge of the prevailing market rates, and my experience with court awards in voting rights cases, I believe that my current rate for a case such as this case is \$613.00. This rate is supported by the expert opinion of Mr. Bill Edwards in his declaration filed with this motion. Therefore, Plaintiff requests a rate of \$613.00 per hour for Mr. Garza's time in this action.

5 In addition, I have known TRLA Executive Director, Robert Doggett for over 20 years. I have had the opportunity to litigate this case with Mr. Doggett, as my co-counsel, making me familiar with the high quality of his work. I am also familiar with Mr. Doggett's reputation in the legal community and know that he is both a skilled and a respected member of the bar. In addition, I have known TRLA attorney Marinda van Dalen for over ten years and through this and

other litigation I witnessed the skills and quality of work of Ms. van Dalen and can attest to the skill and high quality of her work. Ms. van Dalen was TRLA's primary contact with our clients including our organizational client, La Union del Pueblo Entero, (LUPE).

**Lodestar**

6. In determining the Lodestar a court should usually consider the actual hours devoted to the case and the market hourly rate for the lawyer in question. I have devoted over 789.9 hours to the successful prosecution of this cause and am requesting compensation for 472.9 of those hours, after a discount of 317 hours in an exercise of billing judgment. In addition, our expert, Mr. Bill Edwards and Jose Garza have both testified that a prevailing market rate commensurate with the matrix of the USAO of \$613.00 per hour, for someone of Mr. Jose Garza's experience, in this case is reasonable. Therefore, the lodestar requested in this case for Jose Garza is \$289,887.70 (472.9 hrs. x \$613.00 = \$289,887.70)

7. *Preclusion of Other Employment.* My work in this litigation restricted the time available for pursuit of other litigation during the period of activity in this case. Because of the extensive work required in a time-compressed period of time, I was unable to accept and work on other cases.

8. *Time Limitation Imposed by Circumstances.* The time limitations in this case were imposed by pending election schedules and by the failure of the State Defendants to comply with the provisions of the Voting Rights Act in a timely manner.

9. *Undesirability of the Case.* This case was filed pursuant to the Voting Rights Act, 42 U.S.C. §1973c. Counsel for Plaintiff represents the individual poverty level plaintiffs and the organizational Plaintiff LUPE. This case is very undesirable because the expedited election schedule and multiple forums placed unusual time constraints on the development and preparation of the case and because of the specialized nature of the actions. Moreover, the case required

significant time and resources to properly prosecute, and recovery of a fee and expenses was contingent on success. Finally, even though success is now insured, recovering a reasonable fee is still remote in time. Working on a case of a contingent nature for over two years, without a reasonable fee thus also makes this case undesirable.

10. *Experience and Expertise.* My experience has included participation in federal litigation, extensive advocacy in state and federal administrative hearings, and preparation of pleadings, briefs and evidence for cases in both state and federal courts. I am or have been counsel in numerous voting rights cases including the following challenges under the Fourteenth Amendment and the Voting Rights Act: *Alonzo v. Jones*, C-81-277 (S.D. Tex. 1981)[Lead counsel in a successful action challenging the at-large election system for the City of Corpus Christi, Texas under the newly amended Voting Rights Act.]; *Comm. Court of Medina County v. United States*, 719 F. 2<sup>nd</sup> 1179 (D.C. 1983)[Lead counsel representing minority defendant-interveners opposing Medina County's gerrymander redistricting plan in a preclearance action under Section 5 of the Voting Rights Act. Successfully overturned District Court's failure to award attorneys' fees.]; *Lockhart v. United States*, 102 S. Ct. 988 (1983)[Lead counsel representing minority defendant-interveners opposing City of Lockhart's preclearance proceedings before the United States District Court for the District of Columbia and arguing counsel before the United States Supreme Court.]; *Terrazas v. Clements*, 537 F. Supp. 514 (N.D. Tex. 1982)[Co-counsel in successful challenge to States redistricting plans for Bexar and El Paso Counties.]; *Gomez v. City of Watsonville*, 863 F. 2<sup>nd</sup> 1407 (9<sup>th</sup> Cir. 1988)[Co-counsel in successful challenge to the at-large election system for the City of Watsonville, California.]; *Overton and Calderon v. City of Austin*, 871 F. 2<sup>nd</sup> 529 (5<sup>th</sup> Cir. 1989)[Lead counsel for Mexican American plaintiffs in challenge to at-large election system for the City of Austin.]; *Sanchez v. Bond*, 875 F. 2<sup>nd</sup> 1488 (10<sup>th</sup> Cir. 1989)[Lead counsel in challenge to the election structure for Saguache County, Colorado Commissioners.]; *Mena v. Richards*, C- 454-91-F (332<sup>nd</sup> Judicial District, Hidalgo County, Texas, 1992)[Co-counsel in successful challenge to the 1991 redistricting plans for the Texas House of

Representatives and Texas Senate.]; *LULAC v. NEISD*, 903 F. Supp. 1071 (W. D. Tex. 1995)[Co-counsel in successful challenge to election system for Trustees of the North East I.S.D.]; *LULAC v. State of Texas*, 113 F. 3<sup>rd</sup> 53 (5<sup>th</sup> Cir. 1998)[Lead counsel in successful challenge of a State election change under Section 5 of the Voting Rights Act.]; *Perez v. Pasadena I.S.D.*, 165 F. 3<sup>rd</sup> 368 (5<sup>th</sup> Cir. 1999)[Co-counsel in challenge to the at-large election system for Trustees of the Pasadena I.S.D.]; *Valdespino v. Alamo Heights I.S.D.*, 168 F. 3<sup>rd</sup> 848 (5<sup>th</sup> Cir. 1999)[Lead counsel in challenge to at-large election system for Trustees of the Alamo Heights I.S.D.] and of course in this case, including argument before the United States Supreme Court in (*Perry v. Perez*, 132 S.Ct. 934 (2012) [Lead counsel for appellee]) and numerous others. Also, in an article published by Texas Lawyer, a respected professional legal trade magazine, I was named one of twenty-five extraordinary minority lawyers in Texas in 2009. Finally, I was named Appellate Lawyer of the week by the National Law Review after my oral argument before the United States Supreme Court in *Perry v. Perez*.

11. I have provided advice and direction to other private attorneys in at-large election challenges, Section 5 enforcement actions, and gerrymandering election challenges, as well as to various legal agencies in Texas. I have also testified before a Congressional subcommittee on the renewal of the Voting Rights Act. I have also been an adjunct professor at the University of Texas, School of Law and at St. Mary's University, School of Law where I taught a seminar course on Voting Rights.

12. It is my opinion, based on my experience, on awards made for my services in similar cases several years ago and upon inquiring of other lawyers, that the prevailing market rate for an attorney of over forty years of experience, trying a case in his/her area of specialization, in a difficult and complicated civil rights case is between \$600 and \$700 per hour.

13. *Results Obtained and other Enhancement Factors.* The results obtained in this case were precisely what the Plaintiffs requested as an appropriate remedy, injunctive relief, remedies to violations of Section 2 and Section 5 of the Voting Rights Act.

## **Costs**

The TRLA advanced all of the costs and expenses made to properly and effectively prosecute this action. The Taylor Plaintiffs therefore request an award for all costs devoted to this case. These costs include filing fees, service costs, travel associated with communicating and preparing our clients as the litigation commence and progressed, travel associated with the preparation for and presentation of trial, discovery expenses and expert witnesses. These were necessary to the proper presentation of our clients' claims in this case. These expanses totaled: **\$44,273.62** and are evidenced in Exhibits 4 and 5 to Taylor Plaintiffs Motion for Attorneys' Fees. Exhibits 4 and 5 were created by me from a review of receipts and invoices kept in the ordinary course of business by TRLA.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Jose Garza  
Jose Garza

## ATTACHEMENT NO. 1

### RÉSUMÉ

**Jose Garza** has more than forty (40) years of experience practicing law, dealing almost exclusively with federal law. His practice areas focus mainly on governmental entities and federal litigation including 1<sup>st</sup> and 14<sup>th</sup> Amendment issues; redistricting, federal voting rights, and civil rights and state law election challenges. Mr. Garza is currently the Litigation Director for Texas RioGrande Legal Aid, Inc. (part time) as well with the Law Office of Jose Garza.

Mr. Garza has represented Latino voters in voting rights litigation including state-wide redistricting cases. Mr. Garza has testified as LULAC Voting Rights Counsel before the Congress on the re-enactment of Section 5 of the Voting Rights Act and has Represented LULAC in various voting rights matters including as co-counsel in *LULAC v. Perry*, where the U.S. Supreme Court found the Texas Congressional districting plan illegal under the VRA, because it discriminated against Latino voters. Formerly, he was involved in voting rights litigation as Program Director for the Mexican American Legal Defense and Education Fund (MALDEF). Mr. Garza has taught voting rights seminars as an adjunct professor at the University of Texas at Austin, School of Law and St. Mary's University, School of Law. In addition, he currently represents the Mexican American Legislative Caucus (MALC) in the 2011 state redistricting litigation and on other voting rights issues and matters.

Education: B.S. in Education, Texas A&I (1971-1973); Masters of Education, University of Texas at San Antonio (1973-1975); J.D., St. Mary's University (1975-1978).

Relevant Experience: *Law Office of Jose Garza* (1997-1998; March 2001-present); *Texas Rural Legal Aid, Inc.* (1978-1979; 1990- present (part-time)); *Gray & Becker* (1994-1996); *Mexican American Legal Defense & Education Fund* (1979-1990); *Texas Attorney General* (1986);

Adjunct Teaching Positions: *University of Texas, School of Law* (1988-1994) and *St. Mary's University, School of Law* (1990-1995)

Significant Cases:

***Aguero v. Christopher***, 481 F. Supp. 1272 (S.D. Tex. 1980) - Lead counsel in successful farmworker action brought to enforce provisions of Wagner-Peyser Act and Fair Labor Standards Act.

***Alonzo v. Jones***, C-81-277 (S.D. Tex. 1981) - Lead counsel in a successful action challenging the at-large election system for the City of Corpus Christi, Texas under the newly amended Voting Rights Act.

***Comm. Court of Medina County v. United States***, 719 F. 2<sup>nd</sup> 1179 (D.C. 1983) - Lead counsel representing minority defendant-intervenors opposing Medina County=s

gerrymandered redistricting plan in a preclearance action under Section 5 of the Voting Rights Act. Successfully overturned District Court's failure to award attorneys fees.

**Lockhart v. United States**, 102 S. Ct. 988 (1983) - Lead counsel representing minority defendant-interveners opposing City of Lockhart's preclearance proceedings before the United States District Court for the District of Columbia and before the United States Supreme Court (arguing counsel).

**Terrazas v. Clements**, 537 F. Supp. 514 (N.D. Tex. 1982) - Co-counsel in successful challenge to States redistricting plans for Bexar and El Paso Counties.

**Gomez v. City of Watsonville**, 863 F. 2<sup>nd</sup> 1407 (9<sup>th</sup> Cir. 1988) - Co-counsel in successful challenge to the at-large election system for the City of Watsonville, California.

**Overton and Calderon v. City of Austin**, 871 F. 2<sup>nd</sup> 529 (5<sup>th</sup> Cir. 1989) - Lead counsel for Mexican American plaintiffs in challenge to at-large election system for the City of Austin.

**Sanchez v. Bond**, 875 F. 2<sup>nd</sup> 1488 (10<sup>th</sup> Cir. 1989) - Lead counsel in challenge to the election structure for Saguache County, Colorado Commissioners.

**Mena v. Richards**, C-454-91-F (332<sup>nd</sup> Judicial District, Hidalgo County, Texas, 1992) - Co-counsel in successful challenge to the 1991 redistricting plans for the Texas House of Representatives and Texas Senate.

**LULAC v. NEISD**, 903 F. Supp. 1071 (W. D. Tex. 1995) - Co-counsel in successful challenge to at large election system for Trustees of the North East I.S.D.

**LULAC v. State of Texas**, 113 F. 3<sup>rd</sup> 53 (5<sup>th</sup> Cir. 1998) - Lead counsel in successful challenge of a State election change under Section 5 of the Voting Rights Act.

**Perez v. Pasadena I.S.D.**, 165 F. 3<sup>rd</sup> 368 (5<sup>th</sup> Cir. 1999) - Co-counsel in challenge to the at-large election system for Trustees of the Pasadena I.S.D.

**Valdespino v. Alamo Heights I.S.D.**, 168 F. 3<sup>rd</sup> 848 (5<sup>th</sup> Cir. 1999) - Lead counsel in challenge to at-large election system for Trustees of the Alamo Heights I.S.D.

**Gomez v. City of Eagle Pass**, 91 F. Supp. 1000 (W. D. Tex. 2000) - Co-counsel in successful action against the City of Eagle Pass for illegal termination of City Manager in violation of Title VII's protection from gender discrimination, and 14<sup>th</sup> Amendment's protections from political patronage discrimination.

**Balderas v. State of Texas**, (E.D. Tex. 2001) - Co-counsel representing the Mexican American Legislative Caucus, in successful challenge to 2001 Texas redistricting plan for the Texas House of Representatives.

**LULAC v. Perry**, 126 S. Ct. 2594 (2006) - Co-Counsel representing the League of United Latin American Citizens (LULAC) in successful challenge to the 2003 Texas Congressional redistricting plan.

**Perry v. Perez**, 132 S.Ct. 934 (2012) - Lead counsel for the Mexican American Legislative Caucus in 2011 Texas redistricting litigation. Arguing counsel.

**Vasquez-Lopez v. Medina County, Texas** 11-cv-945, W.D. Tex., San Antonio Division, 2012 - Lead counsel in successful Section 5 enforcement action.



**ATTACHMENT NO. 2**  
Voter ID litigation  
**TIME RECORDS FOR JOSE GARZA**

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

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**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

H O U R S

[CASE ID VID07: Voter Identification]					
VID07 85B-IND-Electio	[CR] Case Review confer with J.Valdez-Cox. Confer with MvD.	08/22/2013	10:00 - 11:00	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[TV] Travel travel to san antonio. confer with DOJ lawyer about new filing on voter ID law.	08/22/2013	11:01 - 15:19	[40115] Jose Garza	4.3
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed doj complaint, reviewed GK data on locations of dps stations.	08/23/2013	11:11 - 11:47	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[C] Conference w/ confer with Marinda on status of investigation.	08/26/2013	10:04 - 10:16	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review and modify client letter.	08/26/2013	10:17 - 10:29	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[CR] Case Review review file. confer with MvD and RD on efforts to educate client community about status of law.	08/30/2013	14:20 - 14:50	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[CR] Case Review investigation. interviewed Edinburg political figure on status of special city election and use of voter id law. conferred with counsel for Hidalgo County. called javier in Eagle Pass to see what status of election there.	09/13/2013	15:01 - 16:37	[40115] Jose Garza	1.6
VID07 85B-IND-Electio	[C] Conference w/ national groups interested in intervening in pending litigation. confer with Javier on issues related to voter id and recent eagle pass election. call potential victim in D'Hanis. review recently filed pleadings.	09/17/2013	10:30 - 12:48	[40115] Jose Garza	2.3
VID07 85B-IND-Electio	[CR] Case Review review file. confer with Marinda and DH. confer with Gerry Hebert on status of existing cases.	09/19/2013	14:39 - 15:15	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed draft press advisory on work of local comm. organization on voter id educational campaign. confer with Marinda on same and potential victims. confer with RRios on potential victims in Hidalgo county and possible meeting on thursday.	09/20/2013	11:36 - 12:00	[40115] Jose Garza	0.4
VID07 85B-IND-Electio	[CR] Case Review review emails on file. respond to emails. confer with counsel on case.	09/20/2013	12:01 - 13:01	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[C] Conference w/ DH and MvD. discuss status and additional assignments.	09/20/2013	13:02 - 14:02	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[INV] Investigation travel to Hidalgo County. meet with local community leaders and potential victims of vid law. interview and place open records request with City Sec. of Edinburg. travel back to San Antonio.	09/26/2013	08:03 - 18:03	[40115] Jose Garza	10.0
VID07 85B-IND-Electio	[CR] Case Review confer with Marinda on recent interviews, developments in the case.	09/27/2013	16:02 - 16:20	[40115] Jose Garza	0.3
VID07 85B-IND-Electio	[INV] Investigation confer with plaintiffs in existing case on scheduling issues.	10/01/2013	11:37 - 12:07	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[INV] Investigation meet with potential expert on issues involving intent behind enactment of the law.	10/03/2013	12:16 - 13:22	[40115] Jose Garza NC	1.1

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review summaries prepared by Marinda. Confer with counsel on existing case on request by DOJ to stay proceedings. review correspondence.	<b>10/04/2013</b>	<b>08:52 - 10:10</b>	<b>[40115] Jose Garza</b>	<b>1.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> confer with MvD on status of case and search for victims of the law.	<b>10/04/2013</b>	<b>10:11 - 10:23</b>	<b>[40115] Jose Garza</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> recieved and review election data from city of Edinburg. confer with Edith regarding input of data. recieved and review draft from MvD. confer with MvD.	<b>10/10/2013</b>	<b>09:29 - 11:35</b>	<b>[40115] Jose Garza</b>	<b>2.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on draft of complaint. review notes and suggestions from MvD. Review pleadings in place. confer with staff.	<b>10/21/2013</b>	<b>09:15 - 14:15</b>	<b>[40115] Jose Garza</b>	<b>5.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue work on complaint. Confer with MvD. Confer with counsel on case already filed. review filed pleadings.	<b>10/22/2013</b>	<b>11:17 - 16:23</b>	<b>[40115] Jose Garza</b>	<b>5.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> worked on draft of complaint. c/w MvD. legal research on venue and relief available.	<b>10/23/2013</b>	<b>13:21 - 15:21</b>	<b>[40115] Jose Garza</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> David and George concerning strategies and sources of information on case. confer with marinda on status of client information.	<b>10/24/2013</b>	<b>16:17 - 17:05</b>	<b>[40115] Jose Garza</b>	<b>0.8</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with Marinda on issues. confer with client, (Hernandez) explain status and insure we have approval to proceed. review pleadings.	<b>10/25/2013</b>	<b>16:10 - 17:10</b>	<b>[40115] Jose Garza</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on complaint. review edits and suggestions. review sos web page.	<b>10/27/2013</b>	<b>17:52 - 20:28</b>	<b>[40115] Jose Garza</b>	<b>2.6</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> DH, MvD, RD on complaint and process. confer with Gerry Hebert on Davis amendment on "substantially similar" issue. work on new draft. review senate journal.	<b>10/28/2013</b>	<b>09:56 - 12:20</b>	<b>[40115] Jose Garza</b>	<b>2.4</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on complaint. (2) confer with MvD. (.8) review Edinburg election material. (1) review senate journal. modify complaint. confer with potential expert. (1) review senate journal on amendments offered. (1.2)	<b>10/29/2013</b>	<b>10:12 - 16:12</b>	<b>[40115] Jose Garza</b>	<b>NC 6.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b>	<b>10/30/2013</b>	<b>15:21 - 17:27</b>	<b>[40115] Jose Garza</b>	<b>NC 2.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue to work on complaint. review dh edits. review emails on clients. review reports on impact on high profile voters. confer with potential expert.	<b>10/31/2013</b>	<b>09:46 - 13:22</b>	<b>[40115] Jose Garza</b>	<b>3.6</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on v6 of complaint, send around. review email on reporter questions. confer with co-counsel.	<b>11/03/2013</b>	<b>09:49 - 12:31</b>	<b>[40115] Jose Garza</b>	<b>2.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on revisions to complaint. research issues of women and the vote in texas. modify fact statement. finalize complaint.	<b>11/05/2013</b>	<b>09:18 - 13:18</b>	<b>[40115] Jose Garza</b>	<b>NC 4.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file. review ct's order. review pleadings in Veasey. review emails from DH and RD.	11/06/2013 15:58 - 17:22	[40115] Jose Garza	1.4
VID07 85B-IND-Electio	[CR] Case Review review court's files on related cases. review pending motion to dismiss. review local rules and disclosure requirements.	11/08/2013 12:07 - 14:13	[40115] Jose Garza	2.1
VID07 85B-IND-Electio	[CR] Case Review review file. review emails. confer with Brennan Center and with counsel in MALC AND NAACP legal action.	11/11/2013 12:47 - 13:47	[40115] Jose Garza NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ DH on potential experts, conversations with other P's counsel and issues of coordination and cooperation.	11/12/2013 08:40 - 09:22	[40115] Jose Garza NC	0.7
VID07 85B-IND-Electio	[DP] Document - prepare work on issuance of summons, research service of process on state agency officials.	11/12/2013 09:23 - 11:23	[40115] Jose Garza NC	2.0
VID07 85B-IND-Electio	[C] Conference w/ confer with NAACP plaintiffs' lawyers on coordination and other issues.	11/13/2013 08:20 - 09:14	[40115] Jose Garza NC	0.9
VID07 85B-IND-Electio	[CR] Case Review review file. review note from SW. reviewed complaint made modifications to refile. conferred with MvD.	11/13/2013 09:28 - 09:58	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[DP] Document - prepare review edits finalize amended complaint file. review file.	11/14/2013 10:48 - 11:30	[40115] Jose Garza	0.7
VID07 85B-IND-Electio	[CR] Case Review review notes from court on process for hearing on veassey hearing. Confer with Lawyers committee and NAACP.	11/14/2013 11:31 - 12:13	[40115] Jose Garza	0.7
VID07 85B-IND-Electio	[CTC] Court Contact prepare for and attend court hearing in Veassey. Confer with MvD about hearing.	11/15/2013 09:04 - 10:16	[40115] Jose Garza	1.2
VID07 85B-IND-Electio	[MEM] Memorandum, review memo on witness search issues.	11/15/2013 10:17 - 10:29	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[C] Conference w/ counsel for photo ID plaintiffs. Prepare for same. confer with other trla staff on case. review court's docket. review proposed drafts of pleadings.	11/18/2013 14:39 - 16:39	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review file, review schedules and deadlines, (.5) confer with co-counsel regarding trial preparation and strategies and division of labor. (1.6) review emails on interview schedules with potential experts. (.1)	11/19/2013 16:47 - 18:59	[40115] Jose Garza	2.2
VID07 85B-IND-Electio	[CR] Case Review Review file. research role of sec. of state on service of process. secure address for service of DPS	11/20/2013 13:27 - 15:57	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	defendant, confer with RD, modify summons and file request for issuance. (.8). Review email from ER on issue of coordination between cases. (.2) work on certificate of interested parties, modify and circulate. (.2) Confer with p's counsel in Veassey regarding AG advisory and review AG advisory. confer with ER on same. consider impact on Ortiz. (1.3)			

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, review ezra's email. review memo to brennen center et al, modify - confer with Ezra. review dh revisions. send out. review summons issue and email dogget on same. (.9) Research Senate factors, review vote denial cases and search for potential expert. (1.3)	<b>11/21/2013 09:02 - 11:14</b>	<b>[40115] Jose Garza</b>	<b>2.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[MTG] Meeting w/</b> potential experts, Jewell and Leeland. travel to Austin and back. (2.8); meet and confer with Jewell, DH and RD. (1.7); meet and confer with L., DH, RD and MvD. (1.1); prepare for meetings. (.8)	<b>11/22/2013 08:35 - 14:59</b>	<b>[40115] Jose Garza</b>	<b>6.4</b>
<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> review files, review potential expert qualifications, (1), prepare for meeting with potential expert, Dr. Garcia, review profile and list of articles, (.3), drive to St. Mary's (.2), meet with and interview potential expert, (.9), confer with MvD about same and discuss case issues. (.2)	<b>11/26/2013 11:21 - 13:51</b>	<b>[40115] Jose Garza NC</b>	<b>2.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file. review emails and data. review notes on conversation with Dr. Cotrell, call and leave message for Dr. Jaramillo, email Jaramillo.	<b>11/27/2013 11:16 - 12:16</b>	<b>[40115] Jose Garza NC</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[INV] Investigation</b> Prepare for and do interview potential expert.	<b>12/02/2013 09:09 - 11:09</b>	<b>[40115] Jose Garza NC</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[INV] Investigation</b> review emails, review resume of potential experts, confer with MvD on same and on meeting with potential expert in Edinburg.	<b>12/04/2013 11:55 - 13:01</b>	<b>[40115] Jose Garza</b>	<b>1.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file.	<b>12/08/2013 11:41 - 12:41</b>	<b>[40115] Jose Garza NC</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[IW] Interview Witnesses</b> travel to edinburg (4), interview potential witness in Edinburg, UTPA professor, (1.3) confer with Co-counsel (.8); travel to Sabastian (.8); interview clients (2); confer with co-counsel (1); travel to Weslaco. (.5)	<b>12/10/2013 07:56 - 18:20</b>	<b>[40115] Jose Garza NC</b>	<b>10.4</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> received and reviewed state's motion to dismiss, review emails.	<b>12/17/2013 13:12 - 13:54</b>	<b>[40115] Jose Garza</b>	<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> recieved and reviewed motion to dismiss. reviewed staff emails on same.	<b>12/19/2013 11:22 - 11:40</b>	<b>[40115] Jose Garza</b>	<b>0.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> continue reviewing motion to dismiss, research issues raised.	<b>12/22/2013 11:24 - 13:24</b>	<b>[40115] Jose Garza</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> continue review of motion to dismiss. review time requirements for response. work on motion for consolidation. legal research and draft document. review local rules and send out email pursuant to local rules.	<b>12/23/2013 11:25 - 15:25</b>	<b>[40115] Jose Garza</b>	<b>4.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> review motion to dismiss. review cases.	<b>12/30/2013 14:35 - 16:35</b>	<b>[40115] Jose Garza NC</b>	<b>2.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> continue working on motion to dismiss, review cases dealing with sov. immunity and interplay with supplemental jurisdiction issues. (1) Work on pleadings - motion for extension of time and motion to consolidate. (1.5). confer with opposing counsel and with Katy N. (.5), finalize and file motion for extension of time. (.7); conferred with DOJ regarding their position on consolidation. confer with KN on research found. (.3).	<b>01/02/2014</b>	<b>10:24 - 14:24</b>	<b>[40115] Jose Garza</b>	<b>4.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> review cases and continue working on response to motion to dismiss. (Raygor v. Regents of U of Minn.) review arc of california case. (2). confer with Katy on research and drafting issues. (.3)	<b>01/03/2014</b>	<b>10:27 - 12:45</b>	<b>[40115] Jose Garza</b>	<b>2.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> prepare for conference with team. review motion and malc response. review notes. confer with RD and MvD and KN. review cases.	<b>01/03/2014</b>	<b>12:46 - 13:46</b>	<b>[40115] Jose Garza</b>	<b>NC 1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file. confer with MvD on schedule. review emails. continue work on response to motion to dismiss.	<b>01/03/2014</b>	<b>13:47 - 15:05</b>	<b>[40115] Jose Garza</b>	<b>1.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> confer with mvd and rd. work on brief in response.	<b>01/07/2014</b>	<b>14:07 - 16:07</b>	<b>[40115] Jose Garza</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on response brief to motion to dismiss. begin draft, review cases.	<b>01/08/2014</b>	<b>10:08 - 15:50</b>	<b>[40115] Jose Garza</b>	<b>5.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on brief in opp. to motion to dismiss. review amended complaint, responses of legal defense fund and malc. send out draft to co-counsel.(5) call doj on consolidation motion. finalize consolidation motion, file. (.5); confer with MvD. (.1)	<b>01/09/2014</b>	<b>10:26 - 16:02</b>	<b>[40115] Jose Garza</b>	<b>5.6</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on memo in opp. review edits of co-counsel, work on last section. review recent 5th cir. case on supp. jurisdiction. review court's order on consolidation.	<b>01/10/2014</b>	<b>10:47 - 14:05</b>	<b>[40115] Jose Garza</b>	<b>3.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on response to motion to dismiss. review latest edits from MvD and RD.	<b>01/12/2014</b>	<b>12:55 - 16:37</b>	<b>[40115] Jose Garza</b>	<b>3.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> continue working on brief. review organizational standing issue. review additional edits. work on voting proceedings covered by sec. 2 . modify brief on standing issues, and regarding defendants' claims regarding procedural modifications to election rules. review edits, finalize and file.	<b>01/13/2014</b>	<b>11:12 - 17:42</b>	<b>[40115] Jose Garza</b>	<b>6.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> discuss schedule and discovery with MvD	<b>01/16/2014</b>	<b>09:00 - 09:12</b>	<b>[40115] Jose Garza</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, emails, and review schedule. organize file.	<b>01/16/2014</b>	<b>09:13 - 10:13</b>	<b>[40115] Jose Garza</b>	<b>NC 1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> confer and go over schedules and work assignments with team. confer with doj on status of case and secure documents already on file in discovery etc.	<b>01/17/2014</b>	<b>16:04 - 17:04</b>	<b>[40115] Jose Garza</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review data analysis draft agreement. confer with counsel in Veasey and NAACP. review emails from RD.	<b>01/21/2014</b>	<b>11:10 - 13:10</b>	<b>[40115] Jose Garza</b>	<b>2.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file, confer with co-counsel and expert. review correspondence.	01/22/2014	09:42 - 11:00	[40115] Jose Garza		1.3
VID07 85B-IND-Electio	[C] Conference w/ with all plaintiffs group on coordination and strategy discussion.	01/22/2014	11:01 - 12:13	[40115] Jose Garza		1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review doj document on wording with data. confer with Marinda, and confer with other P's counsel. call doj.	01/24/2014	15:42 - 18:00	[40115] Jose Garza		2.3
VID07 85B-IND-Electio	[CR] Case Review work on expert instructions, review file. confer with Marinda.	01/27/2014	10:00 - 11:00	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review file, legal research.	02/03/2014	10:13 - 13:13	[40115] Jose Garza		3.0
VID07 85B-IND-Electio	[DNR] Deposition - Review/Summarize review discovery documents and drafts of proposed discovery process and document processing strategies sent out by doj. confer with co-counsel and counsel for other plaintiffs. review courts' schedule and hearing schedule.	02/04/2014	10:14 - 15:14	[40115] Jose Garza		5.0
VID07 85B-IND-Electio	[CR] Case Review review file. participate in tel. conference on status of data gathering and matching process. review emails, review documents from doj.	02/05/2014	09:34 - 11:04	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[CR] Case Review and conference with other counsel on the case and doj.	02/05/2014	11:05 - 11:11	[40115] Jose Garza		0.1
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs) confer with expert regarding discovery material. (.7) travel to Austin (1.5); prepare for potential witness interview. (.5); interview potential witness on legislative process. LF (1.8); travel to san antonio. (1.6).	02/06/2014	10:00 - 16:06	[40115] Jose Garza		6.1
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) begin to prepare for wed. hearing. review motion to dismiss, review cases, and response. review file. confer with staff, and counsel in other cases.	02/10/2014	09:59 - 13:59	[40115] Jose Garza		4.0
VID07 85B-IND-Electio	[CR] Case Review review documents on discovery - confer with doj, naacplegal defense fund and ezra rosenberg. review data from Kathleen, reveiw emails from MvD and JLavariega.	02/11/2014	08:50 - 10:50	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review motions from doj, and motion to dismiss. confer with MvD and RD, on issues for hearing tomorrow. (2) travel to CC (2.5)	02/11/2014	10:51 - 15:21	[40115] Jose Garza		4.5
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) confer with chadd Dunn and Armond Derfner from Veasey Ps, and Ezra R. from NAACP about hearing and issues involved. (1)	02/11/2014	15:22 - 16:22	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[HG] Hearing attend cour hearing on discovery issues in CC. (1.2) confer and debrief with co-counsel. (1); travel to SA (2.5).	02/12/2014	11:36 - 16:18	[40115] Jose Garza		4.7



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with expert (Lavariega), (.4); confer with co-counsel. (.3); Discuss issues with Counsel for Hisp. county judges, discuss common areas, potential common research issues dealing with hidalgo county, (.5)	<b>02/13/2014</b>	<b>10:30 - 11:42</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> prepare for hearing on potential agreed order on exchange of data to be matched. review drafts of "agreement" confer with co-counsel, etc.	<b>02/14/2014</b>	<b>10:54 - 12:06</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[HG] Hearing</b> Hearing on discovery and scheduling issues.	<b>02/14/2014</b>	<b>12:07 - 12:37</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review drafts of compromise language. confer with co-counsel. review emails from counsel and from the court.	<b>02/14/2014</b>	<b>12:38 - 13:20</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review draft of expert report. (.4); confer with expert, KJ and co-counsel. (.6); review emails and files. (.2)	<b>02/18/2014</b>	<b>10:12 - 11:24</b>	<b>[40115] Jose Garza</b>		<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with lawyers committee on possible experts of rbv.	<b>02/18/2014</b>	<b>11:25 - 11:43</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> reviewed court orders, and new filings by State. (.7) reviewed emails and new material from counties. (.5).	<b>02/19/2014</b>	<b>11:34 - 12:46</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review emails on conference call and identification of experts, confer with staff on same and schedule. confer with Ezra Rosenberg concerning issues for conference call. review responses to motion for legislative privilege protective order. Review In re Perry.	<b>02/20/2014</b>	<b>09:09 - 11:09</b>	<b>[40115] Jose Garza</b>		<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> prepare for cross party conference call. review emails, review court docket.	<b>02/20/2014</b>	<b>11:10 - 11:22</b>	<b>[40115] Jose Garza</b>		<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> plaintiff group on this case.	<b>02/20/2014</b>	<b>11:23 - 12:29</b>	<b>[40115] Jose Garza</b>		<b>1.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review emails and drafts of legal documents. confer with MvD and RD. review legal brief on leg. privilege and edits suggested. confer with MPosner. call ER.	<b>02/24/2014</b>	<b>09:35 - 11:35</b>	<b>[40115] Jose Garza</b>		<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> review documents on data match and on legislative privilege issues (1). confer with expert and co-counsel (.8). travel to CC for hearing (3). review emails, confer with Katy regarding pending motions and possible new motions. (.2)	<b>03/04/2014</b>	<b>10:42 - 15:42</b>	<b>[40115] Jose Garza</b>		<b>5.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> review court's docket, pull documents and review for tomorrows hearing. Confer with RR, organize hearing notebook.	<b>03/04/2014</b>	<b>15:43 - 17:25</b>	<b>[40115] Jose Garza</b>		<b>1.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> review motion and responses on leg. privilege, review drafts of proposed trial, discovery, etc. schedules.	<b>03/05/2014</b>	<b>08:24 - 09:36</b>	<b>[40115] Jose Garza</b>		<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[HG] Hearing</b> court hearing on outstanding issues ( leg. privilege and motion to compel production).	<b>03/05/2014</b>	<b>09:37 - 11:37</b>	<b>[40115] Jose Garza</b>		<b>2.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[TV] Travel</b> travel to Edinburg for meeting with expert.	<b>03/05/2014</b>	<b>11:38 - 14:38</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>3.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, confer with co-counsel. (.3). travel to Weslaco for meeting with DH. (.5)	<b>03/05/2014</b>	<b>15:40 - 16:28</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.8</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> with DH. Update status of case and costs issues.	<b>03/06/2014</b>	<b>09:34 - 10:46</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[TV] Travel</b> travel to San Antonio.	<b>03/06/2014</b>	<b>10:47 - 15:17</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>4.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with MvD on status of open records requests. review emails and "script" discuss modifications with MvD. review emails from doj, review letter drafted by Texas OAG at request of court. respond to suggestion from doj. review edits, and other email responses.	<b>03/07/2014</b>	<b>10:34 - 11:10</b>	<b>[40115] Jose Garza</b>		<b>0.6</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with katy on records issues. review email from JL.	<b>03/10/2014</b>	<b>09:06 - 09:18</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, review schedule. confer with Vessey counsel on issues to be discussed at hearing on the 26th.	<b>03/18/2014</b>	<b>11:33 - 12:03</b>	<b>[40115] Jose Garza</b>		<b>0.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> Jessica L. on status of data collection, confer with Kathleen on same. review emails on same.	<b>03/18/2014</b>	<b>12:04 - 12:22</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review emails between counsel, review deposition schedule and begin review rpd discovery requests. Confer with Chad Dunn regarding deposition schedule. Confer with Gerry Hebert regarding request for production requests and expert analysis.	<b>03/25/2014</b>	<b>09:11 - 12:41</b>	<b>[40115] Jose Garza</b>		<b>3.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> Rreview file. confer with KN, review pleadings and trial and hearing schedule. call client and confer.	<b>03/31/2014</b>	<b>10:23 - 11:23</b>	<b>[40115] Jose Garza</b>		<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> Travel to CC, (2.6); confer with MvD regarding hearing, client issues, expert issues, etc. (1.4); review motions, briefs etc. for hearing prep. (1).	<b>03/31/2014</b>	<b>11:24 - 16:24</b>	<b>[40115] Jose Garza</b>		<b>5.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[TP] Trial, prep</b> prepare for and attend hearing on scheduling issues and discovery issues. (2.8); confer with co-counsel on client issues, discovery responses, etc. (1); interview client Ortiz (1.2); interview client Taylor (2.4); travel to San antonio (2.7).	<b>04/01/2014</b>	<b>07:29 - 17:35</b>	<b>[40115] Jose Garza</b>		<b>10.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> doj and the state of texas on discovery issues.	<b>04/02/2014</b>	<b>13:00 - 13:30</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> doj, state and other plaintiffs on scheduling order and discovery issues.	<b>04/02/2014</b>	<b>13:31 - 14:13</b>	<b>[40115] Jose Garza</b>		<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review schedules, review emails, review MvD's outline of issues. confer with Katy on motions needed. (motion to dismiss Rox. Her.)	<b>04/02/2014</b>	<b>14:14 - 15:14</b>	<b>[40115] Jose Garza</b>		<b>1.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file. review emails and correspondence. Confer with MvD and Ezra R regarding time issues and deposition coverage issues.	<b>04/03/2014</b>	<b>12:31 - 13:43</b>	<b>[40115] Jose Garza</b>		<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review email, review pleadings filed, review election records and communications.	<b>04/04/2014</b>	<b>13:22 - 16:22</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>3.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> co-counsel and expert. review status of case. confer regarding contract issues. etc.	<b>04/11/2014</b>	<b>02:24 - 03:24</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> review advisory from Ezra, confer w/MvD regarding same, review Hebert Edits, confer with Ezra regarding same. (1); Confer with MvD regarding current schedule (.3); confer with Katy on pleadings needed for filing on Roxanne, etc. (.2); review emails and other correspondence. (.5).	<b>04/14/2014</b>	<b>09:11 - 11:11</b>	<b>[40115] Jose Garza</b>		<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> expert and co-counsel regarding status of research. (.4); review file, emails, filings. (.7); court hearing on motions to compel (.9)	<b>04/16/2014</b>	<b>08:28 - 10:28</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> co-counsel regarding status of case, schedule and discovery issues. (.8); review emails, filings, correspondence, etc. (.4);	<b>04/17/2014</b>	<b>10:02 - 11:14</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> all plaintiffs' counsel, and doj on status of schedule, discovery, trial strategy, etc. review rfps. (2)	<b>04/17/2014</b>	<b>11:15 - 13:15</b>	<b>[40115] Jose Garza</b>		<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DISC] Discovery (drafting docs)</b> reviewed rfp and interrogatories. communicate with Emma from Veassey Ps about modifications. Conferred with Doggett and MvD.	<b>04/17/2014</b>	<b>13:16 - 13:58</b>	<b>[40115] Jose Garza</b>		<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> confer with MvD regarding current schedule, events, etc. (.2); prepare for and participate in conference call with other P counsel regarding discovery and depositions. (.7); review schedule and respond to emails and calls. (.3)	<b>04/21/2014</b>	<b>12:59 - 14:11</b>	<b>[40115] Jose Garza</b>		<b>1.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, review schedule. respond to emails. (.3); Jewell weekly conf. call. (.5); confer with other plaintiffs on deposition for tomorrow. (.3)	<b>04/22/2014</b>	<b>10:47 - 11:53</b>	<b>[40115] Jose Garza</b>		<b>1.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[TV] Travel</b> to Austin for deposition and back.	<b>04/23/2014</b>	<b>06:47 - 10:47</b>	<b>[40115] Jose Garza</b>		<b>4.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DNP] Deposition - Prep</b> review files, confer with P's counsel and co-counsel. (.7)	<b>04/23/2014</b>	<b>10:48 - 11:30</b>	<b>[40115] Jose Garza</b>		<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[DEP] Deposition - Take</b> of K. Ingram, 30 b 6, for SOS.	<b>04/23/2014</b>	<b>11:31 - 15:31</b>	<b>[40115] Jose Garza</b>		<b>4.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, (.2) receive and review document: state's motion to quash on behalf of 3rd party legislators. (.3) review agenda for conference call and review emails on same, modifications and discussion. (.2); review master calendar (.1); review Derfner letter, and court's email. (.3)	<b>04/25/2014</b>	<b>10:55 - 12:01</b>	<b>[40115] Jose Garza</b>		<b>1.1</b>
<b>VID07</b> 85B-IND-Electio	<b>[TV] Travel</b> travel to the valley for meeting with Juanita and Marinda.	<b>04/28/2014</b>	<b>15:35 - 19:35</b>	<b>[40115] Jose Garza</b>		<b>4.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[DISC] Discovery (drafting docs)</b> 04/29/2014 12:25 - 18:25 [40115] Jose Garza 6.0 meeting with Juanita from UNION del Pueblo. discuss discovery document requested by State. Review and update status of case. confer with Marinda. (1.7) Travel to San Antonio. (4.3)
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 05/01/2014 10:39 - 13:15 [40115] Jose Garza NC 2.6 review emails, review outline from expert. update file.
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> 05/05/2014 09:43 - 12:49 [40115] Jose Garza NC 3.1 Marinda, RD and Jessica. Discuss status of analysis and modifications that should be included. Confer with M and R about schedule. review file. confer with Ezra and Marty on schedule. discuss options.
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 05/06/2014 13:18 - 14:18 [40115] Jose Garza 1.0 review file, review pleadings filed. confer with MvD. review emails from other counsel.
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 05/08/2014 12:11 - 14:11 [40115] Jose Garza 2.0 review email, review discovery documents submitted by doj. confer with staff.
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> 05/08/2014 14:12 - 14:54 [40115] Jose Garza NC 0.7 all plaintiff counsel - review variety of issues on status of case.
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 05/14/2014 10:05 - 12:05 [40115] Jose Garza 2.0 review files, confer with counsel for plaintiffs on deposition schedules. review filings.
<b>VID07</b> 85B-IND-Electio	<b>[HG] Hearing</b> 05/15/2014 08:39 - 09:51 [40115] Jose Garza 1.2 status hearing with the court on outstanding matters. (1) review file. confer with MvD. review emails on motions and schedules. (.2)
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 05/21/2014 14:05 - 15:05 [40115] Jose Garza NC 1.0 review emails, review drafts of privilege agreement. review deposition schedule. confer with mark posner. (1)
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 08/01/2014 15:47 - 16:47 [40115] Jose Garza 1.0 review file, review email exchanges on discovery and expert deposition schedules.
<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> 08/02/2014 11:00 - 14:24 [40115] Jose Garza 3.4 organize file. (1); review emails regarding expert depositions. (.2); review new filings, review defendants' expert reports. (1.8); review and calendar notice of depositions. (.4).
<b>VID07</b> 85B-IND-Electio	<b>[DNP] Deposition - Prep</b> 08/04/2014 16:41 - 18:53 [40115] Jose Garza 2.2 review korbel report (1); review correspondence on discovery issues and deposition schedule. (.3); review to do list, review emails and other correspondence. (.2); organize file. (.7).
<b>VID07</b> 85B-IND-Electio	<b>[TP] Trial, prep</b> 08/05/2014 16:10 - 18:10 [40115] Jose Garza 2.0 confer with MvD, review expert reports, review client fact sheet. Review Korbel exhibits, Korbel deposition.
<b>VID07</b> 85B-IND-Electio	<b>[TP] Trial, prep</b> 08/06/2014 17:25 - 18:19 [40115] Jose Garza 0.9 review communications on expert depositions. review proposed stips. review email from RD and MvD. Confer with Korbel on his deposition. review and organize file.
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> 08/08/2014 09:47 - 11:47 [40115] Jose Garza 2.0 REVIEW EMAILS, REVIEW NEW PLEADINGS AND DISCUSSIONS ON FOF AND WITNESS ORDER. REVIEW DOJ MOTION TO DEEM ADMITTED AND MOTION TO STRIKE ANSWER.
<b>VID07</b> 85B-IND-Electio	<b>[TP] Trial, prep</b> 08/18/2014 17:07 - 19:19 [40115] Jose Garza 2.2 review defs' filings. review depositions.

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[TP] Trial, prep review file, legal research. review correspondence, confer with doj lawyer freeman.	08/19/2014	09:06 - 11:06	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[TP] Trial, prep review emails on final depositions and schedules. review court orders. review jewell report and review exhibit lists.	08/21/2014	16:03 - 18:51	[40115] Jose Garza	2.8
VID07 85B-IND-Electio	[TP] Trial, prep review drafts of FOF, confer with Ezra. Review emails on discovery disputes. Legal research.	08/22/2014	15:02 - 18:02	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[TP] Trial, prep review dc record, review proposed findings of fact etc.	08/27/2014	09:57 - 12:27	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	[TP] Trial, prep review court's orders, review parties communications on order of witnesses. Confer with potential witnesses.	08/27/2014	12:28 - 13:28	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[TP] Trial, prep review expert reports, prepare logistics for trial. organize files.	08/29/2014	11:24 - 13:54	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	[TP] Trial, prep review summaries of client facts, review depositions of clients. review witness depositions.	08/31/2014	10:47 - 16:47	[40115] Jose Garza	6.0
VID07 85B-IND-Electio	[TL] Trial trial in CC. Attend trial, present witness, opening statement. (8.7); trial preparation for next day, review transcripts, confer with co-counsel and other p's counsel. (1.5)	09/02/2014	07:20 - 17:32	[40115] Jose Garza	10.2
VID07 85B-IND-Electio	[TL] Trial Trial (9), ass't with witness prep. (2); confer with co-counsel (1); confer with other P's counsel (.3).	09/03/2014	07:20 - 19:38	[40115] Jose Garza	12.3
VID07 85B-IND-Electio	[TL] Trial trial (9); trial prep. (3)	09/04/2014	07:20 - 19:20	[40115] Jose Garza NC	12.0
VID07 85B-IND-Electio	[TL] Trial trial (8); travel to SA (2.8)	09/05/2014	07:20 - 18:08	[40115] Jose Garza	10.8
VID07 85B-IND-Electio	[CR] Case Review review transcripts of last weeks trial. Review emails, confer with staff.	09/08/2014	10:15 - 12:15	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CR] Case Review review trial transcript, review emails description of case, and issues arising.	09/10/2014	09:12 - 12:12	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[TP] Trial, prep review trial transcripts, review findings of fact drafts	09/13/2014	14:18 - 17:18	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[TP] Trial, prep review discovery responses, review trial transcripts, confer with counsel. review COL drafts.	09/15/2014	15:20 - 18:20	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[TP] Trial, prep review new transcripts, review fof and col drafts, confer with counsel.	09/17/2014	15:24 - 19:24	[40115] Jose Garza	4.0
VID07 85B-IND-Electio	[CR] Case Review review file, review time lines. confer with staff.	09/25/2014	13:28 - 16:28	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[CR] Case Review review emails circulating. review research on possible stay. review status of Wisconsin appeal.	09/30/2014	15:50 - 19:50	[40115] Jose Garza	4.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review court's order. confer with staff regarding issues raised by opinion.	<b>10/09/2014</b>	<b>19:21 - 23:21</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>4.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> review court's order, review draft of response to state's advisory. confer with co-counsel. review local rules for atty fee deadlines.	<b>10/10/2014</b>	<b>12:52 - 15:52</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>3.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> review State's mandamus request and alternative motion for stay. review drafts of responses - review 5th cir. order and filings. confer with RD and MvD.	<b>10/12/2014</b>	<b>12:11 - 15:11</b>	<b>[40115] Jose Garza</b>		<b>3.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review emails, confer with co-counsel. review draft pleadings. sup. court orders.	<b>10/15/2014</b>	<b>13:52 - 16:22</b>	<b>[40115] Jose Garza</b>		<b>2.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, organize files. review emails regarding atty's fees.	<b>10/16/2014</b>	<b>12:54 - 14:54</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>2.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> review trial transcript. review appellate court rules for 5th cir. appeal.	<b>10/17/2014</b>	<b>10:55 - 13:55</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>3.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, review correspondence on proposed court order. confer with co-counsel.	<b>10/20/2014</b>	<b>16:49 - 19:19</b>	<b>[40115] Jose Garza</b>		<b>2.5</b>



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review	10/21/2014	10:50 - 12:50	[40115] Jose Garza	NC	2.0
	review draft motions on atty's fees. confer with staff. review rules of civil procedure and local rules.					
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	10/28/2014	09:53 - 14:53	[40115] Jose Garza	NC	5.0
	review file, review and organize files from trial.					
VID07 85B-IND-Electio	[R] Research, Legal	11/05/2014	13:33 - 16:33	[40115] Jose Garza	NC	3.0
	review sup ct. cases on section 2 standards, review 3c orders, review file, organize same.					
VID07 85B-IND-Electio	[CR] Case Review	11/10/2014	14:32 - 16:20	[40115] Jose Garza	NC	1.8
	review file. review email correspondence, review filings.					
VID07 85B-IND-Electio	[CR] Case Review	11/11/2014	14:32 - 17:02	[40115] Jose Garza		2.5
	review filings on exhibits for 5th cir.					
VID07 85B-IND-Electio	[CR] Case Review	11/13/2014	11:08 - 13:08	[40115] Jose Garza	NC	2.0
	review file. review filings. confer with co-counsel.					
VID07 85B-IND-Electio	[CR] Case Review	11/14/2014	10:06 - 12:06	[40115] Jose Garza		2.0
	review file. review exhibits in the case. review outline for 5th cir. appeal. confer with MvD.					
VID07 85B-IND-Electio	[CR] Case Review	11/18/2014	10:41 - 11:41	[40115] Jose Garza	NC	1.0
	review email from MP. review file.					
VID07 85B-IND-Electio	[CR] Case Review	11/18/2014	11:42 - 13:42	[40115] Jose Garza	NC	2.0
	review emails from Posner. review proposed outline for 5th cir. issues. Review response to Veasey motion to expedite. review file.					
VID07 85B-IND-Electio	[CR] Case Review	11/25/2014	15:36 - 17:36	[40115] Jose Garza		2.0
	review file and review emails - review filed pleadings					
VID07 85B-IND-Electio	[CR] Case Review	12/01/2014	17:29 - 19:47	[40115] Jose Garza	NC	2.3
	review email from posner, review drafts of outline for 5th cir. brief.					
VID07 85B-IND-Electio	[CR] Case Review	12/02/2014	17:41 - 20:41	[40115] Jose Garza	NC	3.0
	Review file. Organize. review transcript provisions.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/03/2014	14:30 - 16:30	[40115] Jose Garza		2.0
	review motion from Veasey group and posner draft response.					
VID07 85B-IND-Electio	[CR] Case Review	12/04/2014	13:33 - 15:33	[40115] Jose Garza	NC	2.0
	review emails on motion to expedite and conference call set up. review files.					
VID07 85B-IND-Electio	[CR] Case Review	12/05/2014	17:42 - 19:54	[40115] Jose Garza		2.2
	confer with Ezra, review emails, review transcript of TRLA witnesses.					
VID07 85B-IND-Electio	[CR] Case Review	12/08/2014	11:36 - 14:00	[40115] Jose Garza	NC	2.4
	confer with posner and review emails on issues in case.					
VID07 85B-IND-Electio	[CR] Case Review	12/15/2014	09:53 - 10:53	[40115] Jose Garza		1.0
	review transcript of TRLA witnesses at trial.					
VID07 85B-IND-Electio	[C] Conference w/	12/16/2014	09:49 - 12:49	[40115] Jose Garza		3.0
	confer with Posner on status of briefing and assignments to different parties. review calendar for appeal. review recent argument at the Sup. Ct. on voting case.					
VID07 85B-IND-Electio	[C] Conference w/	12/17/2014	12:44 - 15:44	[40115] Jose Garza	NC	3.0
	with Mark Posner on status of case and issues needed to be developed. reviewed file.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file.	12/19/2014	09:52 - 10:52	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review file, review requests and emails on different topics. Confer with MvD on status of clients and on our role on appeal.	01/06/2015	10:10 - 11:22	[40115] Jose Garza		1.2
VID07 85B-IND-Electio	[CR] Case Review review file. review emails, review docket.	01/09/2015	15:22 - 16:04	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review review transcripts of trial and expert reports - examine for testimony on 2/3 rule.	01/12/2015	09:07 - 13:07	[40115] Jose Garza	NC	4.0
VID07 85B-IND-Electio	[CR] Case Review continue review of trial record for testimony and exhibits discussing 2/3rds rule.	01/13/2015	09:08 - 12:38	[40115] Jose Garza	NC	3.5
VID07 85B-IND-Electio	[C] Conference w/ Mark Posner and Jerry Hebert on process for review of State's brief, as well possible meeting in March in Austin.	01/20/2015	11:12 - 12:12	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review filing by state on counsel appearance. (.3); review file. (.7)	01/21/2015	09:20 - 10:20	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters confer with staff, review files.	01/21/2015	10:21 - 12:21	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review emails from Posner on schedule and strategy for briefing. review file.	01/21/2015	12:22 - 13:10	[40115] Jose Garza	NC	0.8
VID07 85B-IND-Electio	[CR] Case Review review court's order, review emails. (1)	01/23/2015	09:22 - 10:22	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and began review of state's brief and record excerpts.	01/27/2015	17:03 - 19:03	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[C] Conference w/ MvD regarding emails and schedule.	01/28/2015	09:35 - 09:53	[40115] Jose Garza		0.3
VID07 85B-IND-Electio	[CR] Case Review continue to review record excerpts, review email, confer with MP about conference call schedule. 2	01/28/2015	09:54 - 11:54	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[C] Conference w/ with mark posner concerning conf. call topics and gen. status of appeal. begin review of state's brief.	01/29/2015	16:34 - 18:34	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review emails on amicus and Dallas county status in case.	02/04/2015	16:14 - 17:14	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed amicus brief.	02/05/2015	16:10 - 18:10	[40115] Jose Garza		2.0



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review	02/17/2015	16:49 - 17:37	[40115] Jose Garza		0.8
	review filings and emails between counsel. review discussion on sealed documents.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/18/2015	17:53 - 18:53	[40115] Jose Garza		1.0
	review corrected brief from state.					
VID07 85B-IND-Electio	[CR] Case Review	02/26/2015	09:40 - 11:40	[40115] Jose Garza	NC	2.0
	review file, review state's brief. Confer with bob kengle at lawyer's committee regarding status of brief.					
VID07 85B-IND-Electio	[CR] Case Review	02/27/2015	15:41 - 17:29	[40115] Jose Garza		1.8
	review file, review state's brief, review record excerpts, transcript etc.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/02/2015	10:31 - 11:31	[40115] Jose Garza		1.0
	received and reviewed drafts of brief.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/03/2015	12:30 - 14:30	[40115] Jose Garza		2.0
	recieved and reviewed drafts of our brief to the 5th cir. confer with MVD. Confer with Lawyer's Committee lawyers.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/04/2015	13:28 - 15:40	[40115] Jose Garza		2.2
	received and reviewed briefs filed by appellees and USA. review emails on request for extension of time on reply brief.					
VID07 85B-IND-Electio	[CR] Case Review	03/09/2015	09:20 - 12:20	[40115] Jose Garza	NC	3.0
	review file, confer with lawyer's committee on schedule. review briefs on file.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/10/2015	10:21 - 13:21	[40115] Jose Garza	NC	3.0
	recieved and reviewed amicus briefs.					
VID07 85B-IND-Electio	[CR] Case Review	03/25/2015	16:13 - 18:55	[40115] Jose Garza		2.7
	review emails, review briefs and review impact of sc's dec. in Wis. case.					
VID07 85B-IND-Electio	[CR] Case Review	03/31/2015	11:13 - 11:49	[40115] Jose Garza		0.6
	review file, confer with Ezra and MvD.					
VID07 85B-IND-Electio	[CR] Case Review	04/01/2015	13:52 - 14:52	[40115] Jose Garza	NC	1.0
	review file, review emails on argument. confer with co-counsel.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/02/2015	10:52 - 12:52	[40115] Jose Garza	NC	2.0
	review reply brief. review correspondence from clerk of the 5th cir. look up appearance form. k to review schedule for travel to argument.					
VID07 85B-IND-Electio	[CR] Case Review	04/06/2015	10:22 - 10:40	[40115] Jose Garza		0.3
	review emails, review logistics for argument. review 5th cir. calendar.					
VID07 85B-IND-Electio	[C] Conference w/	04/15/2015	10:06 - 10:48	[40115] Jose Garza	NC	0.7
	conference in prep. for oral argument. all groups included.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/15/2015	10:49 - 12:31	[40115] Jose Garza		1.7
	review topics considered for oral argument submitted by ldf. review our brief.					
VID07 85B-IND-Electio	[CR] Case Review	04/21/2015	13:46 - 14:16	[40115] Jose Garza		0.5
	review file, review panel make up. review emails regarding moot court schedule.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file. finalize logistical issues on oral argument travel.	04/23/2015 16:39 - 17:03	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) organize file. review appellate briefs. (1.2); wait at the airport to travel to N. O., flight cancelled as we waited on the plain. (2); confer with MvD and Chad Dunn. (.2)	04/27/2015 11:23 - 14:47	[40115] Jose Garza	NC	3.4
VID07 85B-IND-Electio	[CR] Case Review review and listen to oral argument at 5th cir. (.9) review file and organize. (.2)	04/29/2015 10:56 - 12:02	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[CR] Case Review review filing by the state. review request from Ezra on response.	05/28/2015 11:51 - 12:51	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review state's letter brief and drafts of doj response. confer with co-counsel and review email.	05/29/2015 10:30 - 11:48	[40115] Jose Garza	NC	1.3
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings by Ezra etc.	06/01/2015 18:31 - 19:31	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review new correspondence from state and co-counsel. review draft letter to 5th cir. and respond.	06/25/2015 09:31 - 11:31	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review recent filings with 5th cir. review recent rulings.	07/08/2015 10:35 - 11:35	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review reviewed files. reviewed 5th cir. rules.	07/17/2015 10:55 - 11:55	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed 5th cir. dec. confer with MVD and with other P's counsel.	08/05/2015 14:04 - 16:34	[40115] Jose Garza		2.5
VID07 85B-IND-Electio	[C] Conference w/ Lawyers committee attys. confer with DHall Doggett and MVD on our position moving forward.	08/06/2015 15:19 - 16:01	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review review file for deadlines on fees, scope of stay. review emails.	08/07/2015 15:25 - 17:25	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review file, confer with lawyers committee and brennan center counsel on next steps.	08/10/2015 16:05 - 17:35	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[CR] Case Review review emails, confer with MvD and with ER. review file.	08/12/2015 11:01 - 12:07	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[CR] Case Review review file. review 5th cir. op. and review perry; review status of id challenges in other states.	08/13/2015 15:13 - 16:13	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review review file. review emails on status of motion for interim relief. confer with Ezra on same. review 5th cir. dec.	08/20/2015 08:02 - 09:02	[40115] Jose Garza		1.0
VID07	[DOC] Document - receive/review review motions filed, review emails on possible meetings. review file	08/21/2015 10:13 - 10:37	[40115] Jose Garza	NC	0.4

85B-IND-Electio

VID07

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07

	[CR] Case Review	09/18/2015	16:02 - 17:02	[40115] Jose Garza		1.0
	review reply					
	brief.					
	[CR] Case Review	12/17/2015	13:17 - 14:17	[40115] Jose Garza	NC	1.0
85B-IND-Electio	review file and prepare for conference call. participate in call.					
VID07	[DOC] Document - receive/review	12/22/2015	15:41 - 17:41	[40115] Jose Garza		2.0
85B-IND-Electio	received and reviewed filings by doj and legal defense fund. organize file. confer with co-counsel.					
VID07	[CR] Case Review	02/08/2016	12:01 - 12:19	[40115] Jose Garza	NC	0.3
85B-IND-Electio	review file, confer with co-counsel, telephone conference on status of case on appeal.					
VID07	[CR] Case Review	02/09/2016	14:11 - 16:23	[40115] Jose Garza	NC	2.2
85B-IND-Electio	review file and prepare for phone conference. on conference call.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review	02/10/2016	16:09 - 16:45	[40115] Jose Garza	NC	0.6
	review files, review emails, confer with Ezra on phone conference aftermath.					
VID07 85B-IND-Electio	[CR] Case Review	02/16/2016	12:27 - 13:27	[40115] Jose Garza	NC	1.0
	prepare for conference call. review file. review status of case. review court's orders.					
VID07 85B-IND-Electio	[C] Conference w/	02/22/2016	12:27 - 13:27	[40115] Jose Garza		1.0
	lawyer's committee on status and pending issues. review file.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/09/2016	13:57 - 17:39	[40115] Jose Garza		3.7
	reviewed and reviewed most recent motion from Veasey. Recieved and reviewed order and scheduling from 5th cir. on en banc consideration. confer with legal team. review email					
	correspondence on same.					
VID07 85B-IND-Electio	[CR] Case Review	03/14/2016	13:50 - 15:50	[40115] Jose Garza		2.0
	review file, review briefs already filed. review nc case.					
VID07						
VID07 85B-IND-Electio	[CR] Case Review	03/29/2016	09:19 - 10:19	[40115] Jose Garza	NC	1.0
	reviewed orders from 5th cir. regarding briefs and paper copies. Confer with RRios regarding his					
	position and status on en banc review.					
VID07 85B-IND-Electio	[CR] Case Review	04/05/2016	11:53 - 12:53	[40115] Jose Garza		1.0
	confer with counsel. review recent filings and pleadings.					
VID07 85B-IND-Electio	[CR] Case Review	04/07/2016	12:00 - 14:00	[40115] Jose Garza		2.0
	review recent voting dec. from sup. court. discuss possible ramification here.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/12/2016	12:34 - 13:34	[40115] Jose Garza		1.0
	review state's response at sc. revie scotus blog articles on pending motion.					
VID07 85B-IND-Electio	[CR] Case Review	06/01/2016	09:02 - 10:44	[40115] Jose Garza		1.7
	prepare for conference call on status and new issues. review emails, review oral argument audio.					
VID07 85B-IND-Electio	[CR] Case Review	06/01/2016	10:45 - 12:03	[40115] Jose Garza	NC	1.3
	review draft of rule 28j, review emails for conf. call this afternoon.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[C] Conference w/ litigation team on status and strategy post oral argument. issues to discuss: DOJ suggestions re sup ct. order; issues raised during oral argument; what to do if no dec. by July 20; possible outcomes post argument.	06/01/2016	12:04 - 13:04	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review and organize files, review en banc argument.	06/06/2016	11:50 - 13:20	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files and briefs. check on opinions from court.	06/20/2016	11:00 - 12:18	[40115] Jose Garza	NC	1.3
VID07 85B-IND-Electio	[R] Research, Legal review recent court decisions. check on rules at ct of appeals. confer with co-counsel.	06/21/2016	14:09 - 16:15	[40115] Jose Garza		2.1
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, confer with Gary Bledsoe and Jerry Hebert.	06/22/2016	09:43 - 10:43	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[PC] Press Contact interview with CNN.	06/27/2016	11:44 - 13:14	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[R] Research, Legal review recent sup. ct dec. for impact on standard of review here. confer with co-counsel.	06/28/2016	14:41 - 15:41	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[PC] Press Contact talk to reporter with the houston chronicle about the case and impact of recent sup. ct. dec. on same.	06/28/2016	15:42 - 16:06	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[R] Research, Legal confer with Ezra R. about new sup. ct case and possible application to this case. review new Sup. Ct. case.	06/29/2016	10:14 - 12:14	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review document on topics for discussion on monday's conference call reviewed. Confer with GK on same.	07/08/2016	16:17 - 17:17	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review confer with Veasey counsel on strategies for appeal if necessary. review emails on possible conference call. discuss status of case with Ezra.	07/19/2016	13:46 - 15:46	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[R] Research, Legal review recently release op. from wisconsin district court on aff'd as remedy.	07/19/2016	15:47 - 16:05	[40115] Jose Garza		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed 206 page en banc ruling from 5th cir.	07/20/2016	13:11 - 16:41	[40115] Jose Garza		3.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, review time records. confer with co-counsel.	07/21/2016	14:15 - 14:39	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review continue to review en banc dec. confer with co-counsel regarding negotiation strategies. review email between co-counsel. review draft documents.	07/22/2016	14:30 - 16:36	[40115] Jose Garza		2.1
VID07 85B-IND-Electio	[C] Conference w/ co-counsel, review settlement documents. review emails on negotiations with state.	07/23/2016	14:32 - 16:32	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review aff'd for use in special election, review spanish language provisions confer with co-counsel	07/24/2016	12:30 - 14:18	[40115] Jose Garza		1.8

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

Code	F	Date	Time	Staff	Hours
	i l e / I D / T y p e				
VID07 85B-IND-Electio	regarding same, confer with DOJ on same				
VID07 85B-IND-Electio	[NEGP] Negotiations, prep	07/25/2016	11:15 - 13:15	[40115] Jose Garza	NC 2.0
	confer with Robert and Mirinda about state's response to inquiry on possible compromise. review emails on same confer with RR on same and what his position will be. review ct's order. conference call with all plaintiffs on case. review recently sent drafts of motion to expedite. review pleadings of case and case docket sheet.				
VID07 85B-IND-Electio	[CR] Case Review	07/26/2016	09:00 - 10:00	[40115] Jose Garza	NC 1.0
	review file, review motions, confer with staff, confer with counsel.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/26/2016	10:01 - 11:01	[40115] Jose Garza	NC 1.0
	reviewed motion on schedule. reviewed email on process for counting provisional ballot. reviewed article referenced by email on this. review state's response and attempt to clarify.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/27/2016	11:54 - 12:54	[40115] Jose Garza	1.0
	received and reviewed document on reasonable impediment aff'd difficulties. review email discussion on same.				
VID07 85B-IND-Electio	[R] Research, Legal	07/29/2016	13:37 - 15:37	[40115] Jose Garza	2.0
	review recent decisions on these issues. review email correspondence and respond as needed. organize file.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/31/2016	15:12 - 17:12	[40115] Jose Garza	NC 2.0
	received and reviewed agreed order drafts and comments on same. review file.				
VID07 85B-IND-Electio	[CR] Case Review	08/01/2016	10:13 - 12:13	[40115] Jose Garza	NC 2.0
	review file, review messages on new call and discussions on terms of settlement for interim plan for November. participate in conference call, suggest modification, edit proposed order and circulate.				
VID07 85B-IND-Electio	[C] Conference w/	08/02/2016	08:36 - 09:36	[40115] Jose Garza	1.0
	other P's counsel regarding status of settlement issues. review emails from state and between plaintiffs. review latest drafts of proposals on order.				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> 08/02/2016 09:37 - 11:55 [40115] Jose Garza <b>2.3</b> review files, review 5th cir. decision on intent. review nc opinion on intent. back on conference call with other P's counsel and DOJ. End P's call and join in on call with State AG.
<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> 08/02/2016 11:56 - 12:38 [40115] Jose Garza <b>NC</b> <b>0.7</b> review emails on status of discussions. Conference with State.
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> 08/03/2016 09:00 - 12:00 [40115] Jose Garza <b>3.0</b> continue receiving and reviewing joint order and aff'd. review modifications. participate in plaintiffs counsel conference and on jt. conference with State attys.
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> 08/03/2016 12:01 - 13:01 [40115] Jose Garza <b>NC</b> <b>1.0</b> with state regarding remaining issues. confer with co-counsel regarding remaining issues.
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> 08/04/2016 06:52 - 09:52 [40115] Jose Garza <b>NC</b> <b>3.0</b> received and reviewed ezra's draft of response to State's filings. Confer with MvD. Manage file. organize. Review edits submitted by LDF. - confer with co-counsel. review new draft. and emails. coordinate response on alternative language issue.
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> 08/05/2016 15:58 - 17:58 [40115] Jose Garza <b>NC</b> <b>2.0</b> receive and review filings by state and doj. confer with co-counsel on issues for reply. review reply

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	document and modifications					
<b>VID07</b> 85B-IND-Electio	[C] Conference w/ co-counsel and counsel for DOJ, and other plaintiffs, on strategy for hearing, division of labor. discuss hearing order etc.	08/08/2016	10:34 - 11:34	[40115] Jose Garza		1.0
<b>VID07</b> 85B-IND-Electio	[HGP] Hearing Prep (court) confer with Marinda regarding outreach and education portions of hearing issues. conference in Myrna from Brennen Center. Discuss different alternatives on how to monitor state's program. prepare for moot court with Brennen Center.	08/09/2016	09:05 - 12:35	[40115] Jose Garza	NC	3.5
<b>VID07</b> 85B-IND-Electio	[CR] Case Review confer with Myrna on presentation. confer with Marinda on DOJ position on possible master. confer with Myrna on same.	08/09/2016	12:36 - 13:06	[40115] Jose Garza		0.5
<b>VID07</b> 85B-IND-Electio	[HG] Hearing court hearing, on Nov. election interim remedy.	08/10/2016	08:30 - 09:36	[40115] Jose Garza		1.1
<b>VID07</b> 85B-IND-Electio	[CR] Case Review review emails for logistics on afternoon calls and issues and positions of different plaintiffs. prepare for conference call and participate in call.	08/10/2016	09:37 - 10:37	[40115] Jose Garza	NC	1.0
<b>VID07</b> 85B-IND-Electio	[C] Conference w/ with co-counsel and with others on legal team.	08/10/2016	10:38 - 11:38	[40115] Jose Garza	NC	1.0
<b>VID07</b> 85B-IND-Electio	[DOC] Document - receive/review received and reviewed document draft from Myrna on items for us to review on community and staff ed for nov. election.	08/10/2016	11:39 - 12:09	[40115] Jose Garza		0.5
<b>VID07</b> 85B-IND-Electio	[HGP] Hearing Prep (court) review State's document production on ed and training process for Nov. election. Confer with P's counsel team on same. Participate on conference call with State on same.	08/11/2016	15:23 - 20:23	[40115] Jose Garza	NC	5.0
<b>VID07</b> 85B-IND-Electio	[HGP] Hearing Prep (court) prepare for hearing with court - confer with other parties on status of negotiations on ed. and training input. confer with Marinda on same. participate in new conference with state.	08/12/2016	08:53 - 11:53	[40115] Jose Garza	NC	3.0
<b>VID07</b> 85B-IND-Electio	[CR] Case Review review file, review emails regarding conference call for Tuesday, on intent briefing schedule.	08/14/2016	16:23 - 16:47	[40115] Jose Garza	NC	0.4
<b>VID07</b> 85B-IND-Electio	[CR] Case Review review email from state on submission due tonight. repond.	08/15/2016	15:30 - 15:42	[40115] Jose Garza		0.2
<b>VID07</b> 85B-IND-Electio	[C] Conference w/ legal team and DOJ. discuss appeal issues from state's position. discuss under seal filings, discuss schedule for litigating intent issues. review emails.	08/16/2016	13:45 - 14:57	[40115] Jose Garza	NC	1.2
<b>VID07</b> 85B-IND-Electio	[DOC] Document - receive/review received and reviewed spanish language web page document. reviewed and commented on same. organize file. research possible appeal issues for state.	08/18/2016	13:29 - 14:29	[40115] Jose Garza	NC	1.0
<b>VID07</b> 85B-IND-Electio	[CR] Case Review review comments from AG regarding interim relief and threats of possible perjury prosecutions. review discussions in email concerning possible response.	08/18/2016	14:30 - 14:48	[40115] Jose Garza		0.3



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review calendar conference call schedule.	08/19/2016	09:47 - 09:53	[40115] Jose Garza	NC	0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed draft of memo in support of proposed intent briefing scheduling	08/19/2016	09:54 - 10:12	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review briefing schedule memo.	08/22/2016	10:28 - 10:46	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed supp. memo on scheduling issues. review comments on training manuals.	08/23/2016	11:30 - 12:30	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed correspondence to state on training material. review filings by state and doj on scheduling recommendations.	08/24/2016	14:13 - 15:25	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review court's scheduling order. confer with co-counsel. review email. review chart on local election offices web page references to id rules.	08/25/2016	14:12 - 14:54	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review confer with MvD. regarding conference call.	08/26/2016	10:45 - 10:57	[40115] Jose Garza		0.2
VID07 85B-IND-Electio	[C] Conference w/ confer with co-counsel. confer with MALC regarding their position on issues dealing with sealed filings. organize file, review court's schedule, begin review of record on intent. review transcript, exhibits and court's findings and 5th cir. discussion.	08/26/2016	10:58 - 12:58	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review files, review memos and letter drafts on discovery issue. review emails.	08/29/2016	17:30 - 18:54	[40115] Jose Garza	NC	1.4
VID07 85B-IND-Electio	[CR] Case Review review email on training material; review final drafts of comments and letter to AG; review DOJ comments.	08/30/2016	17:33 - 18:09	[40115] Jose Garza	NC	0.6
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed State's response to complaints about harris county elections administrator's comments. review exhibits. confer with Marinda regarding voter registration/voter id problems affecting newly registered new citizens.	09/02/2016	15:48 - 16:54	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[C] Conference w/ review documents being circulated, review Tex. email, review DOJ motion. participate in counsel conference call.	09/06/2016	10:00 - 12:00	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings by DOJ and plaintiffs. Review court's order and email correspondence.	09/07/2016	16:18 - 16:36	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review draft correspondence to the state on efforts to get message out approp suggest modifications. respond to suggestions. etc.	09/09/2016	14:31 - 14:55	[40115] Jose Garza		0.4.
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, examine for handbook training material -	09/12/2016	13:12 - 14:12	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[C] Conference w/ with other plaintiffs and doj on hearing for Friday. prepare for conference, review proposals and reply by doj.	09/16/2016	11:30 - 12:42	[40115] Jose Garza	NC	1.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> review filings, confer with co-counsel, confer with staff. prepare for hearing.	<b>09/19/2016</b>	<b>10:04 - 11:34</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[HG] Hearing</b> on motion for further relief, and to enforce interim remedial order	<b>09/19/2016</b>	<b>11:35 - 13:11</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.6</b>
<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> review files, review emails - review order from court. confer with co-counsel. circulate new potential issue dealing with driver's license process.	<b>09/20/2016</b>	<b>09:54 - 10:42</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.8</b>
<b>VID07</b> 85B-IND-Electio	<b>[RCD] Received</b> fof outline from doj, began to review and review record of the trial for suggested facts to include on intent issue.	<b>09/20/2016</b>	<b>10:43 - 10:55</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[R] Research, Legal</b> review district court's initial findings of fact, review 5th cir. en banc opinion.	<b>11/10/2016</b>	<b>10:55 - 12:37</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[CM] Case Management (org. file, etc.)</b> review files, review emails from Ezra and others concerning nearing deadline for briefing continue review of old fof. review witness list used at trial.	<b>11/11/2016</b>	<b>10:56 - 11:26</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> draft of intent memo. (.6) review dogget email and respond. (.1)	<b>11/14/2016</b>	<b>11:04 - 11:46</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.7</b>
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> co-counsel regarding intent brief, and cert petition.	<b>11/15/2016</b>	<b>10:28 - 10:58</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.5</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 11/16/2016 11:49 - 12:49 [40115] Jose Garza NC 1.0 review and organize files. Review en banc ruling on intent. review possible foia letters, confer with MvD.
VID07 85B-IND-Electio	[DOC] Document - receive/review 11/18/2016 10:00 - 11:00 [40115] Jose Garza NC 1.0 receive and review new filings from parties.
VID07 85B-IND-Electio	[M&G] Management & general 11/21/2016 09:01 - 12:01 [40115] Jose Garza NC 3.0 review files and organize on new fof filed in case on Friday. Confer with staff concerning plaintiff attorney phone conference scheduled for Tuesday.
VID07 85B-IND-Electio	[C] Conference w/ 11/22/2016 15:47 - 16:47 [40115] Jose Garza NC 1.0 all plaintiffs atty's - discuss status of FOF and response to those filed by State, communications with DOJ, and status of response to cert. pet.
VID07 85B-IND-Electio	[DOC] Document - receive/review 11/22/2016 16:48 - 18:30 [40115] Jose Garza NC 1.7 state's fof, and review record on Anchia's participation on floor debate. review transcript of floor debate, etc.
VID07 85B-IND-Electio	[DOC] Document - receive/review 11/23/2016 12:41 - 13:11 [40115] Jose Garza NC 0.5 Opp. to cert. review finalized and comments to Ezra.
VID07 85B-IND-Electio	[DOC] Document - receive/review 11/28/2016 16:18 - 18:00 [40115] Jose Garza NC 1.7 filing in sup. ct - opposition to cert.
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) 12/09/2016 13:44 - 16:44 [40115] Jose Garza NC 3.0 continue to review filings - DOJ, state FOFs and briefs on matters.
VID07 85B-IND-Electio	[DOC] Document - receive/review 12/15/2016 11:25 - 12:25 [40115] Jose Garza NC 1.0 review draft of response to state's intent filings.
VID07 85B-IND-Electio	[DOC] Document - receive/review 12/19/2016 10:45 - 12:45 [40115] Jose Garza NC 2.0 filings on intent. response briefs and response fof from state, and response brief from doj.
VID07 85B-IND-Electio	[CR] Case Review 12/28/2016 11:15 - 13:15 [40115] Jose Garza NC 2.0 review email from Ezra, check schedule. reply. (.2);continue to review filed briefs. (1.8)
VID07 85B-IND-Electio	[C] Conference w/ 01/05/2017 17:06 - 17:24 [40115] Jose Garza NC 0.3 MvD regarding oral argument conference call. (.3)
VID07 85B-IND-Electio	[C] Conference w/ 01/06/2017 10:08 - 10:56 [40115] Jose Garza NC 0.8 conference call with P group regarding hearing next week on intent issue and logistics for oral argument.
VID07 85B-IND-Electio	[CR] Case Review 01/13/2017 11:29 - 13:29 [40115] Jose Garza NC 2.0 review and organize files. review briefs and two 5th cir. opinions. check on sup. ct docket.
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 01/18/2017 12:01 - 13:13 [40115] Jose Garza NC 1.2 organize files, review sup. ct web page on possible action on cert. pet. review intent briefs in prep. for

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07

85B-IND- next weeks hearing. begin work on logistics for trip. Confer with MvD re: public information request  
 Electio regarding voter registration.

VID07 85B-IND-Electio	[CR] Case Review	01/20/2017	15:31 - 17:43	[40115] Jose Garza	NC	2.2
	review file, confer with co-counsel regarding DOJ's motion for continuance on hearing tuesday. legal research on issue change in administration on pending litigation. review data from MvD's public information request (name match issue). Confer with Martin Golando on same. (1); prepare for and participate in hearing on motion for continuance. (1.2)					
VID07 85B-IND-Electio	[CR] Case Review	02/22/2017	15:52 - 21:22	[40115] Jose Garza		5.5
	review emails from Ezra and others regarding new filing coming from State of Texas and DOJ. Review latest version of voter id law being filed with Senate. (SB 5); confer with co-counsel. Review new motion from State for continuance of Feb. 28 hearing. Review court's correspondence on same and our response.					
VID07 85B-IND-Electio	[CR] Case Review	02/23/2017	12:34 - 15:04	[40115] Jose Garza	NC	2.5
	review and organize files. coordinate with other P's counsel on effects of DOJ shift. review pleadings, motion for continuance and Joint response in opp. confer with co-counsel and discuss with other parties.					
VID07 85B-IND-Electio	[CR] Case Review	02/23/2017	15:05 - 15:53	[40115] Jose Garza	NC	0.8
	review court's order denying motion. review Ezra's note on discussions with DOJ, concerning next tuesday's hearing. confer with Emma regarding travel arrangements.					
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/27/2017	09:32 - 15:50	[40115] Jose Garza	NC	6.3
	review intent briefs filed by parties. and fof. (2.1);confer with co-counsel regarding process for presentation, order of presenters, emphasis. (.2); confer with MvD. (.1). review doj proposed motion. confer with others concerning a unified P position on same, etc. (.3); finalize hearing notebook. (1.1); travel to CC. (2.5);					
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/28/2017	07:20 - 09:20	[40115] Jose Garza	NC	2.0
	review briefs, and fof, review US brief on intent. Confer with MvD on status of clients, and impact of changes on them. prepare presentation.					
VID07 85B-IND-Electio	[HG] Hearing	02/28/2017	09:21 - 12:21	[40115] Jose Garza	NC	3.0
	hearing before Judge Ramos on intent issue and US motion to dismiss, etc.					
VID07 85B-IND-Electio	[MTG] Meeting w/	02/28/2017	12:22 - 12:40	[40115] Jose Garza	NC	0.3
	co-counsel, debrief on hearing. confer with other parties.					
VID07 85B-IND-Electio	[TV] Travel	02/28/2017	12:41 - 15:17	[40115] Jose Garza	NC	2.6
	travel CC to SA. (2.6);					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/01/2017	18:08 - 19:14	[40115] Jose Garza	NC	1.1
	recieved and reviewed transcript of hearing.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/07/2017	10:06 - 11:12	[40115] Jose Garza	NC	1.1
	received and reviewed brief on mootness issue. review emails on response to motion to dismiss. confer with co-counsel.					
VID07 85B-IND-Electio	[CR] Case Review	03/20/2017	09:00 - 11:30	[40115] Jose Garza	NC	2.5
	review brief reply on mootness issue. legal research on this issue. review memo on mootness and new legislation as well.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/10/2017	10:24 - 12:24	[40115] Jose Garza	NC	2.0
	recieved reviewed court's order. confer with co-counsel. review 5th cir. dec on remand scope.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> DH, MvD, and RD scope of the Court's order and effect on additional potential remedial relief.	<b>04/11/2017</b>	<b>10:29 - 10:53</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.4</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, organize file. review time records.	<b>04/17/2017</b>	<b>15:51 - 16:03</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review emails, confer with co-counsel on schedule for conference call.	<b>05/02/2017</b>	<b>10:46 - 10:58</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> confer with p's counsel, discuss issues and strategies.	<b>05/03/2017</b>	<b>08:59 - 09:59</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.0</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review schedule to meet with clients in Willacy County. Confer with MvD on same. review SB5 language. Confer with co-counsel.	<b>05/04/2017</b>	<b>11:30 - 12:00</b>	<b>[40115] Jose Garza</b>		<b>0.5</b>
<b>VID07</b> 85B-IND-Electio	<b>[TV] Travel</b> travel to Valley for meeting with MvD and with clients.	<b>05/08/2017</b>	<b>02:00 - 04:18</b>	<b>[40115] Jose Garza</b>		<b>2.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[T] Telephone call to...</b> MvD to discuss logistics for meeting with clients.	<b>05/08/2017</b>	<b>04:19 - 04:31</b>	<b>[40115] Jose Garza</b>		<b>0.2</b>
<b>VID07</b> 85B-IND-Electio	<b>[HGP] Hearing Prep (court)</b> Travel to meeting with clients and differenct locations. (2); Meet with clients, evaluate possibilities of hearing testimony if needed. Update status of case and update status of client situations. (2); Travel home. (2.3)	<b>05/09/2017</b>	<b>09:33 - 15:51</b>	<b>[40115] Jose Garza</b>		<b>6.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review file, review recent pleading filings. organize file. confer with co-counsel.	<b>07/31/2017</b>	<b>08:50 - 10:14</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>1.4</b>
<b>VID07</b> 85B-IND-Electio	<b>[CR] Case Review</b> review docket. confer with co-counsel.	<b>08/01/2017</b>	<b>15:08 - 15:26</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>0.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> reviewed court's order, review notice of appeal. confer with co-counsel, prepare for conference call. Review motion to stay order. participate in conference call.	<b>08/24/2017</b>	<b>12:29 - 15:29</b>	<b>[40115] Jose Garza</b>	<b>NC</b>	<b>3.0</b>

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[R] Research, Legal Review file. research potential appeal issues. work on frame work for 3c relief.	08/27/2017 11:04 - 14:04	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[C] Conference w/ with legal team. discuss 3c relief. status of response to stay request.	08/28/2017 09:15 - 10:39	[40115] Jose Garza	NC	1.4
VID07 85B-IND-Electio	[R] Research, Legal Review proceedings on stay request. Review Ezra's draft. research question of standards for stay of district court order by 5th Cir.	08/28/2017 10:40 - 14:40	[40115] Jose Garza	NC	4.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review ezra's draft on stay request. review 5th cir. stay standard cases.	08/29/2017 13:26 - 16:26	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review new draft. confer with Gaber with Veasey on his research.	08/30/2017 13:27 - 13:51	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed brief filed on behalf of Private Plaintiffs at the 5th Cir. confer with co-counsel. review emails and comments on status.	08/31/2017 15:50 - 17:50	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review files on appeal. review draft motions, and review 5th Cir. correspondence.	10/03/2017 11:04 - 11:58	[40115] Jose Garza	NC	0.9
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 10/04/2017 16:58 - 17:58 [40115] Jose Garza NC 1.0 review briefs and other pleadings. update file.				
B-IND-Electio	[CR] Case Review review recent filings. review file and organize.	10/05/2017 11:47 - 11:59	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[CR] Case Review review file. review briefing schedule. review memo from Ezra on substance of brief.	10/12/2017 13:54 - 14:30	[40115] Jose Garza	NC	0.6
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files and organize. review 5th Cir. orders and correspondence.	10/18/2017 14:41 - 17:41	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review files, organize and review schedule for argument and briefing. review state's brief. legal research.	10/24/2017 13:57 - 16:57	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review emails on election materials, review election matters from state.	10/25/2017 14:49 - 15:49	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) begin review of time records for all counsel on case in prep. for atty's fees motion.	06/07/2018 13:23 - 16:23	[40115] Jose Garza		3.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, set up meetings with staff to discuss logistics for fee application. check on deadlines, review time entries for possible billing judgment exercise.	06/08/2018 12:53 - 15:47	[40115] Jose Garza		2.9
VID07 85B-IND-Electio	[CR] Case Review review files, confer with Accounting to go over case expenses. Confer with brownsville staff regarding time records and record keeping.	06/12/2018 10:03 - 12:03	[40115] Jose Garza		2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review and organize files, review trial transcript from day 1.	06/19/2018 13:39 - 15:03	[40115] Jose Garza	1.4
VID07 85B-IND-Electio	[R] Research, Legal review notes on discussion regarding state's motion for summary judgment. begin review of prevailing party issue. pull and read district court and 5th cir. dec on fees in Davis v. Abbott.	07/11/2018 09:37 - 12:07	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	[R] Research, Legal continue to review prevailing party question. read recent circuit court decisions.	07/12/2018 16:58 - 17:34	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[CR] Case Review review file, review doj response and our response draft. confer with Ezra.	08/08/2018 13:22 - 13:46	[40115] Jose Garza NC	0.4
VID07 85B-IND-Electio	[CR] Case Review begin review of time records for possible fees application. confer w/ IT regarding generating fees reports.	12/13/2018 16:09 - 17:09	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[CR] Case Review review time records and edit out duplications, billing judgment exclusions, losing issues etc.	01/02/2019 14:18 - 16:18	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[EXH] Exhibit Prep review time logs, modify for potential fees application.	01/11/2019 15:48 - 16:24	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[DP] Document - prepare work on fees motion review time records, modify billable hrs on print work sheet. will begin transfer tomorrow.	01/15/2019 13:02 - 15:20	[40115] Jose Garza	2.3
VID07 85B-IND-Electio	[CR] Case Review continue to review file to prepare documents for fee application.	01/16/2019 15:13 - 16:01	[40115] Jose Garza	0.8
VID07 85B-IND-Electio	[R] Research, Legal review recent rulings on attorney's fees in southern district. review memo on fees.	01/24/2019 11:00 - 13:00	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[DP] Document - prepare work on fees declaration, review time records, confer with others on list. phone conference with other plaintiffs counsel, confer with B. Downs of the Lawyers' Committee.	01/31/2019 15:55 - 20:13	[40115] Jose Garza	4.3
VID07 85B-IND-Electio	[DP] Document - prepare work on fees motion. review templates, review time records.	02/04/2019 15:14 - 17:02	[40115] Jose Garza	1.8
VID07 85B-IND-Electio	[C] Conference w/ conference with all of P's counsel - discuss status of fees applications, need for uniformity, potential expert, etc. confer with doggett and dunn about possible expert.	02/05/2019 13:57 - 14:57	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[DP] Document - prepare continue work on fees motion. review time records, exercise billing judgment. confer with Robert and with chad dunn and with Ezra R. make calls on expert search.	02/06/2019 15:32 - 18:32	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[DP] Document - prepare work on fees documents, declaration, motion etc. also work on securing potential fees expert.	02/08/2019 10:29 - 14:29	[40115] Jose Garza	4.0
VID07 85B-IND-Electio	[DP] Document - prepare continue working on fees exhibits, communicate with Billy Edwards about expert dec. update files on fees research. send email to B. Edwards. work on declaration.	02/15/2019 09:34 - 11:34	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[DP] Document - prepare continue working on modifying time entries to account for duplication and non billable entries on Doggett time lines.	02/15/2019 11:35 - 13:23	[40115] Jose Garza	1.8



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on van dalen time record exhibit.	<b>02/17/2019</b>	<b>13:57 - 17:15</b>	<b>[40115] Jose Garza</b>	<b>3.3</b>
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> work on van dalen exhibits and on doggett exhibits. 1.2	<b>02/19/2019</b>	<b>10:07 - 11:19</b>	<b>[40115] Jose Garza</b>	<b>1.2</b>

**VID07 TOTAL: 789.9**  
**472.9nc**  
**317hrs**

**317 x \$613 = \$194,321.00**



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**DECLARATION OF MARINDA VAN DALEN IN SUPPORT OF REQUEST  
FOR ATTORNEY'S FEES**

**Background and Prevailing Party**

1. I am co-counsel for the Taylor set of Plaintiffs, in the above-styled matter.<sup>1</sup> My resume is attached hereto as Attachment No. 1. I am presenting this declaration in support of Taylor Plaintiffs Motion for Attorney's Fees and Costs. This was an action seeking redress for violations of Section 2 of the Voting Rights Act, 52 U.S.C.A. § 10301, as amended, 2006. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 52 U.S.C.A. § 10310(e), as amended 2006. Specifically, Plaintiffs and their attorneys, including Marinda van Dalen, presented pleadings, evidence, including witness testimony and argument to this Court, challenging the 2011 voter photo ID provisions (commonly referred to as S.B. 14) enacted by the State of Texas. Ultimately, the challenged enactment was enjoined and a remedy imposed because of violations of Section 2 of the Voting Rights Act, found by this Court and affirmed by the *en banc* Fifth Circuit. A review

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<sup>1</sup> In this case I had two distinct roles: one was as an attorney for clients of Texas RioGrande Legal Aid (TRLA) and the other in my private practice, representing the Mexican American Legislative Caucus (MALC). My time in each role was kept separately and is not duplicated. Time spent on this case in my role as Litigation Director for TRLA, is TRLA's time. Time spent on behalf of MALC is done in my private practice.

of Plaintiffs' pleadings, attachments and argument in this case together with this Court's orders, including orders regarding the interim relief, as well as final judgment, demonstrate Plaintiffs' position as prevailing party in this action.

### **Time**

2 My time in this case is kept contemporaneously with the work performed and usually recorded on a daily basis. During the course of this litigation and for the time period ending May 9, 2017,<sup>2</sup> I devoted a total of almost 1,400 hours to assist with the preparation and prosecution of this action, including participating in the trial of this action. In the exercise of billing judgment, I am discounting or not billing for portions of my time, as noted in the time keeping exhibit attached hereto, to account for any potential duplication of time with my co-counsel and to account for possible development of unrelated or unnecessary legal or factual issues and to account only for prevailing issues. Therefore, I am requesting compensation for a total of 1159 hours spent on the case. I have attached the time records that I maintained in this action, as Attachment No. 2.

3 There was no unnecessary duplication of efforts. My co-counsel on this case and I carefully coordinated our efforts so as to avoid unnecessary duplication. We carefully divided tasks and witness and exhibit development in a similar fashion and any overlap was minimal and necessary to avoid errors. Moreover, we consulted with each other in order to better coordinate the development of the case. We also coordinated with counsel for other Plaintiff groups, again to seek to avoid duplication. The amount of time expended in this case was necessary because it presented several difficult questions of fact and law, as well as unsettled issues. Time spent in the days leading to the filing of this action were also necessary to protect TRLA's clients' interests and to properly prepare for what was expected to be a quick progression to trial. Yet, the bulk of Plaintiff's counsel's time in this cause was in the preparation and presentation of this case to this Court. TRLA's clients demonstrated through their testimony, that they were directly impacted by

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<sup>2</sup> I left TRLA in June of 2017 and am now an attorney with New York Lawyers For Public Interest as a Senior Attorney for the Disability Justice and Health Justice Programs.

the requirements of SB 14, in a way that showed a violation of Section 2. The Taylor Plaintiffs' expert, Kevin Jewell, also presented at trial, was able to show the burdens placed on our clients by the requirements of SB 14.

The time spent on this case represents the minimum hours necessary for an adequate preparation of pleadings, exhibits, discovery, including depositions of our clients and presentation to the court. Because of my over twenty years of federal court and civil rights litigation experience, along with the extensive experience of my co-counsel, I did not spend any unnecessary time on issues and evidence developed in this case, and I did not spend time on matters that were not relevant to the prosecution of this action.

### **Market Rate**

4. I have been a member of the Texas Bar for twenty four years. I have also practiced in numerous federal courts outside of Texas. Throughout my career, my practice has focused on complex federal litigation, including civil rights and constitutional law. I have attached my resume as Attachment No. 1 to this declaration. For this case, Plaintiffs ask that the Court adopt the USAO attorney's fees matrix, for 2015-2019 in light of recent fee awards in the Southern District of Texas, which are similar to the matrix index. Based on this matrix I am asking to be compensated at a rate of \$544.00 per hour.<sup>3</sup> Based on my knowledge of the prevailing market rates, I believe that my current rate for a case such as this case is between \$544 and \$572 per hour. This rate is supported by the expert opinion of Bill Edwards in his declaration filed with this motion. Therefore, the Taylor Plaintiffs request a rate of \$544 per hour for Marinda van Dalen's time in this action.

5. In addition, I have known Jose Garza for more than ten years. I have had the

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<sup>3</sup> The matrix indicates that rates for attorney's with between 16 and 20 years of experience for 2018-19 is \$544 per hour. I had more than 19 years of experience in 2013 when this case began. The 2018-2019 rate is appropriate since there is necessarily, a substantial delay in the payment of fees here from when the work was done.

opportunity to litigate this case with Mr. Garza, as my co-counsel, making me familiar with the high quality of his work. I am also familiar with Mr. Garza's reputation in the legal community and know that he is both a skilled and respected member of the bar. In addition, I am familiar with the skills and quality of work of Robert Doggett and other TRLA attorneys who assisted with the prosecution of this cause. Mr. Doggett is a well-respected and skilled attorney and was recently elevated to the position of Executive Director of TRLA. Both of these lawyers are very skilled and produce a high quality of work.

### **Lodestar**

6. In determining the Lodestar a court should usually consider the actual hours devoted to the case and the market hourly rate for the lawyer in question. In my capacity as co-counsel for the Taylor set of Plaintiffs, I devoted nearly 1,400 hours to the successful prosecution of this cause and am requesting compensation for a reduced portion of those hours, totaling 1159 hours. In addition, Mr. Edwards and Jose Garza have both testified that a prevailing market rate commensurate with the matrix of the USAO of \$544 per hour, for someone of my experience, in this case is reasonable. Therefore, the lodestar requested in this case for Marinda van Dalen is \$630,496.00 (1159 hrs. x \$544= \$630,496.00)

7. *Preclusion of Other Employment.* My work in this litigation restricted the time available for pursuit of other litigation during the period of activity in this case. Because of the extensive work required in a time-compressed period of time, I was unable to accept and work on other cases.

8. *Time Limitation Imposed by Circumstances.* The time limitations in this case were imposed by pending election schedules and by the failure of the State Defendants to comply with the provisions of the Voting Rights Act in a timely manner.

9. *Undesirability of the Case.* This case was filed pursuant to the Voting Rights Act, 52 U.S.C.A. § 10301. Counsel for Plaintiff represents the Taylor set of Plaintiffs. This case is very undesirable because the expedited election schedule placed unusual time constraints on the development and preparation of the case and because of the specialized nature of the actions. Moreover, the case required significant time and resources to properly prosecute, and recovery of a fee and expenses was contingent on success. Finally, even though success is now insured, recovering a reasonable fee is still remote in time. Working on a case of a contingent nature for over two years, without a reasonable fee thus also makes this case undesirable.

*Experience and Expertise.* My experience has included participation in state and federal litigation and preparation of pleadings, briefs and evidence for cases in both state and federal courts. I am or have been counsel in numerous civil rights cases including *Doe v. New York City Dep't of Education*, 16-cv-1884, W.D. New York filed April, 9, 2018) [Lead counsel for intervenors seeking to represent district-wide class of students with severe disabilities who have been or may be abused by teachers and other staff; successfully negotiated narrowing of Plaintiff class to permit separate litigation for clients.]; *Serna v. Texas Dept. of State Health Services*, No. 1-15-cv-446-RP, 2015 U.S. Dist. WL 6118623 (W.D. Tex. 2015)[Counsel in successful challenge to Texas' refusal to issue birth certificates to the undocumented parents of Texas-born children]; *Vásquez v. Whataburger*, 2015-DCL-04502 (444<sup>th</sup> Dist. Ct., Tex. filed July 24, 2015) [Action against fast food chain for denial of services to blind customer with service dog at multiple restaurants; monetary and non-monetary relief secured through settlement]; *María S. v. Garza*, 267 F.Supp.3d 923 (2017) (S.D. Tex. 2017) [*Bivens* action on behalf of minor children whose mother was murdered after removal from the U.S. by Border Patrol; unfavorable lower court decision upheld, *Maria S. v.*

Garza, 912 F.3d 778 (5th Cir. 2019)]; *Treviño v. Schroeder*, No. 5:11-cv-4015, 2011 U.S. Dist. WL 5975240 (N.D. Iowa Nov. 28, 2011)[Civil rights suit arising out of the abduction and vicious beating in Iowa of a farmworker from Texas and the ensuing conspiracy by local police and the community to cover up the hate crime; favorable settled secured]; *Lane v. Cole*, 88 F. Supp. 2d 402 (E.D. Pa. 2000) [Suit brought on behalf of a white tenant and three black houseguests alleging violation of the Fair Housing Act based upon the landlords' discriminatory eviction of the tenant; first reported decision holding invitees injured by a discriminatory housing practice have standing to sue; favorable settlement secured].

10. It is my opinion, based on my experience and upon inquiring of other lawyers, that the prevailing market rate for an attorney of my experience, in a difficult and complicated civil rights case is between \$544 and \$572 per hour.

11. *Results Obtained and other Enhancement Factors.* The results obtained in this case were precisely what the Plaintiffs requested as an appropriate remedy, injunctive relief, remedies to violations of Section 2 of the Voting Rights Act.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/S/ Marinda van Dalen  
Marinda van Dalen  
Attorney for Taylor Plaintiffs

## **ATTACHEMENT NO. 1**

### **RESUME**

#### **MARINDA VAN DALEN**

151 W. 30<sup>th</sup> Street  
New York, New York 10001  
(212) 453-5863

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#### ***EXPERIENCE***

##### **NEW YORK LAWYERS FOR THE PUBLIC INTEREST**

*Senior Attorney, Disability Justice and Health Justice Programs*  
New York, New York  
June 2017 to Present

Advocacy on behalf of individuals and organizations to promote justice and equality, with focus on the rights of people with disabilities and immigrants in detention. Multi-pronged approach, including litigation, lobbying, coalition building, organizing, and documentation of abuse and violations.

##### **TEXAS RIOGRANDE LEGAL AID**

*Managing Attorney*  
Brownsville, Texas  
October 2009 to June 2017

- Managed branch with seven attorneys and five additional staff. Responsible for delivery of quality legal services and compliance with program policies and funding regulations. Supervised and evaluated attorneys, staff, and volunteers.
- Litigated complex civil cases, primarily in the area of civil rights, on behalf of individual and organizational plaintiffs. Practiced in federal and state courts in multiple jurisdictions. Extensive experience with experts from a variety of disciplines.

##### **PRIVATE PRACTICE**

New York, New York and Amsterdam, Netherlands  
*Attorney and Consultant*  
January 2001 to January 2006

Provided consulting and legal services to community organizations, educational

institutions, and law firms. Preparation of program reports and legal documents and briefs. Assistance in the development and implementation of strategic plans.

**THE PUBLIC INTEREST LAW CENTER OF PHILADELPHIA**

Philadelphia, Pennsylvania  
*Director, Fair Housing Project*  
September 1998 to November 2000

Director of civil rights project targeting discrimination in the housing and lending markets in and around Philadelphia. Litigation on behalf of individuals and advocacy groups.

**TEXAS RURAL LEGAL AID**

Weslaco, Texas  
*Staff Attorney*  
June 1993 to September 1998

Served as lead counsel in employment and civil rights actions brought on behalf of farmworkers and other low-wage workers. Represented clients in individual cases, multi-plaintiff cases, and class actions.

***EDUCATION***

**CITY UNIVERSITY OF NEW YORK SCHOOL OF LAW**

Juris Doctorate  
New York, New York  
May 1993  
*ILSA Journal of International and Comparative Law*  
Editor in Chief (1992–1993), Editor (1991–1992).  
Research Assistant, Dean Haywood Burns.

**MCGILL UNIVERSITY**

Bachelors in Arts, Anthropology and Women's Studies  
Montreal, Quebec  
June 1989



***ADMISSIONS***

- State Bars of New York (2017), Texas (1994; inactive), and Pennsylvania (1999; inactive).
- Admitted to practice in the Southern and Western Districts of Texas, Eastern District of Pennsylvania, the Court of Appeals for the Fifth Circuit, and the United States Supreme Court.
- Pro Hac Vice practice in New York, New Jersey, Iowa, and Kentucky.

***LANGUAGES*** Fluent in Spanish and Dutch

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File/ID/Type	Code	Date	Time	Staff	Hours
[CASE ID VID07: Voter Identification]					
VID07 85B-IND-Electio	[C] Conference w/ Juanita Cox and Jose Garza at LUPE office to discuss representation and investigation of potential claims.	08/22/2013	08:49 - 09:31	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[TV] Travel BRO / San Juan for meeting.	08/22/2013	09:32 - 11:50	[11064] Marinda van Dalen	2.3
VID07 85B-IND-Electio	[R] Research, Legal read VID cases.	08/22/2013	11:51 - 15:51	[11064] Marinda van Dalen	NC 4.0
VID07 85B-IND-Electio	[T] Telephone call to... doggett re questions, presentations	08/23/2013	12:34 - 12:52	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) enter info in cts	08/23/2013	12:53 - 13:17	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[DP] Document - prepare lists to call. willacy and frio county. huge cts problems. t-roel. learn new excell stuff.	08/23/2013	13:18 - 18:18	[11064] Marinda van Dalen	NC 5.0
VID07 85B-IND-Electio	[L] Letter, draft/send ltr to cl	08/26/2013	14:54 - 15:00	[11064] Marinda van Dalen	NC 0.1
VID07 85B-IND-Electio	[L] Letter, draft/send Finalize acceptance letter to client.	08/26/2013	15:01 - 15:31	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG acceptance ltr	08/26/2013	15:32 - 15:44	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re LUPE status (ACLU), other VID developments; calls in frio and willacy county.	08/26/2013	15:45 - 16:03	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare lists in frio and willacy county to call.	08/26/2013	16:04 - 17:34	[11064] Marinda van Dalen	NC 1.5
VID07 85B-IND-Electio	[C] Conference w/ KG re calls to potential witnesses	08/26/2013	17:35 - 17:59	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[C] Conference w/ Jorge re calls to willacy county	08/26/2013	17:60 - 18:30	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send dgh, RD re elderly, absentee voting.	08/26/2013	18:31 - 18:49	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[R] Research, Legal read other VID cases	08/27/2013	12:53 - 14:23	[11064] Marinda van Dalen	NC 1.5
VID07 85B-IND-Electio	[T] Telephone call to... Juanita cox re mother, others affected.	08/28/2013	12:58 - 13:16	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare plan for calls based upon DPS offices, etc. prep lists.	08/29/2013	13:08 - 15:08	[11064] Marinda van Dalen	NC 2.0
VID07 85B-IND-Electio	[TV] Travel From Brownsville to sebastian to meet with eulalio mendez and wife.	08/30/2013	13:09 - 15:09	[11064] Marinda van Dalen	2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Conference w/	Date	Time	Staff	Hours
85B-IND-Electio		eulalio mendez and his wife. intake itv	08/30/2013	15:15 - 16:40	[11064] Marinda van Dalen	
VID07 85B-IND-Electio	[T]	Telephone call to... JG re intv eulalio mendez	08/30/2013	16:41 - 16:53	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T]	Telephone call to... eulaio mendez re mtg	08/30/2013	16:54 - 17:12	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... joe martin strcp re litn	08/30/2013	17:13 - 17:31	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[C]	Conference w/ KG re com'ty outreach	08/30/2013	17:32 - 17:56	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[TV]	Travel From Brownsville to Sebastian to itv client.	09/02/2013	11:17 - 12:47	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[C]	Conference w/ client re facts, docs, etc.	09/02/2013	12:48 - 13:48	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP]	Document - prepare notes on client mtg	09/03/2013	11:20 - 12:32	[11064] Marinda van Dalen	1.2
VID07 85B-IND-Electio	[DOC]	Document - receive/review admin docs	09/03/2013	12:33 - 13:03	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[EM]	Email, Draft / Send CC fact memo.	09/03/2013	13:04 - 13:16	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[ASMT]	Assignment AT open file.	09/03/2013	13:17 - 13:29	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) admin docs mendez	09/03/2013	13:30 - 13:48	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[C]	Conference w/ and EM, KG re com'ty forums	09/03/2013	13:49 - 14:19	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[EM]	Email, Draft / Send RDOG re forums	09/03/2013	14:20 - 14:32	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[R]	Research, Legal other VID lit'n.	09/03/2013	14:33 - 15:03	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[T]	Telephone call to... marlene re witness calls.	09/03/2013	15:04 - 15:34	[11064] Marinda van Dalen NC	NC 0.5
VID07 85B-IND-Electio	[T]	Telephone call to... katie oconnor re witnesses	09/04/2013	11:47 - 12:11	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[DP]	Document - prepare new script for calls to potential witnesses	09/04/2013	12:12 - 12:42	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[DP]	Document - prepare refugio country list. look at county dats	09/04/2013	12:43 - 14:13	[11064] Marinda van Dalen	NC 1.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Date	Time	Status	Staff	NC	Hours
85B-IND-Electio	[EM] Email, Draft / Send	09/04/2013	14:14 - 14:32	[11064]	Marinda van Dalen	NC	0.3
VID07	KG mult re new jim hogg with gutierrez.	09/04/2013	14:33 - 15:15	[11064]	Marinda van Dalen	NC	0.7
VID07	[T] Telephone call to...	09/05/2013	12:10 - 12:52	[11064]	Marinda van Dalen	NC	0.7
85B-IND-Electio	Gutierrez						
VID07	[MISC] Miscellaneous	09/06/2013	12:16 - 13:16	[11064]	Marinda van Dalen	NC	1.0
85B-IND-Electio	prepare for forums, organize						
VID07	[CM] Case Management (org. file, etc.)	09/06/2013	13:17 - 13:29	[11064]	Marinda van Dalen	NC	0.2
85B-IND-Electio	open new file						
VID07	[DP] Document - prepare	09/09/2013	09:30 - 10:00	[11064]	Marinda van Dalen	NC	0.5
85B-IND-Electio	new call lists for witnesses.						
VID07	[EM] Email, Draft / Send	09/09/2013	10:01 - 10:13	[11064]	Marinda van Dalen	NC	0.2
85B-IND-Electio	korbel re county info/analysis						
VID07	[EM] Email, Draft / Send	09/09/2013	10:14 - 10:32	[11064]	Marinda van Dalen	NC	0.3
85B-IND-Electio	KG re flyers for com'ty ed						
VID07	[EM] Email, Draft / Send	09/10/2013	11:26 - 11:44	[11064]	Marinda van Dalen	NC	0.3
85B-IND-Electio	Jose re doc's re dps offices.						
VID07	[R] Research, Legal	09/11/2013	12:46 - 13:04	[11064]	Marinda van Dalen	NC	0.3
85B-IND-Electio	voter reg reg						
VID07	[NTF] Note to File	09/12/2013	11:33 - 11:39	[11064]	Marinda van Dalen		0.1
85B-IND-Electio	LUPE executive director Juanita Valdez-Cox has requested TRLA investigate potential claims of the organization and its members under the Voting Rights Act with regard to the Texas Voter Identification law and its implementation.						
VID07	Ms. Gutierrez is a voter in Jim Hogg County who does not have any of the acceptable forms of identification to vote. (LUPE member)						
85B-IND-Electio							
VID07	[R] Research, Legal	09/12/2013	12:25 - 15:25	[11064]	Marinda van Dalen		3.0
85B-IND-Electio	read pleadings in pending VID cases						
VID07	[T] Telephone call to...	09/19/2013	11:15 - 11:27	[11064]	Marinda van Dalen	NC	0.2
85B-IND-Electio	jose garza re press inquiries.						
VID07	[EM] Email, Draft / Send	09/19/2013	11:28 - 11:46	[11064]	Marinda van Dalen	NC	0.3
85B-IND-Electio	JGarza re press inquireis						
VID07	[C] Conference w/	09/20/2013	16:37 - 17:19	[11064]	Marinda van Dalen		0.7
85B-IND-Electio	jose and david re outreach, litigation						
VID07	[T] Telephone call to...	09/20/2013	17:20 - 17:32	[11064]	Marinda van Dalen		0.2
85B-IND-Electio	Martha Sanchez, msg from. (LUPE)						

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Telephone call to...	Date	Time	Start	End	Hours
85B-IND-Electio		jose re call from martha sanchez	09/20/2013	17:45	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	CC re cmplt, status	09/23/2013	11:60 - 12:18	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare	cmplt	09/23/2013	12:32 - 14:32	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DP] Document - prepare	e.v.n. press release. research reg. t-jgarza. em mike s.	09/23/2013	14:33 - 15:33	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send	CC, cmpls, update	09/23/2013	15:34 - 15:46	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[C] Conference w/	lara intakes (3)	09/26/2013	14:01 - 16:01	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[TV] Travel	Raymondville, Sebastian, Raymondville potential client meetings.	09/26/2013	16:02 - 18:02	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DP] Document - prepare	organizae docs of lara - photos of docs taken at mtg	09/27/2013	12:39 - 13:09	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[DP] Document - prepare	mm on lara intakes. check background info, qualifications etc.	09/27/2013	13:10 - 14:10	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send	KG re lara intake memo	09/27/2013	14:11 - 14:23	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send	CC. lara mm	09/27/2013	14:24 - 14:36	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare	table of potential plaintiffs/witnesses, factual details.	09/27/2013	14:37 - 16:07	[11064] Marinda van Dalen		1.5
VID07 85B-IND-Electio	[T] Telephone call to...	JG re ordering BC for Laras. Agreed best to clarify w. births were reg'd.	09/30/2013	11:25 - 11:43	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[T] Telephone call to...	cameron county vital stats - re lara births. not reg'd with county	09/30/2013	11:44 - 12:02	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[T] Telephone call to...	austin vital stats - only can check w birth registered by ordering BC.	09/30/2013	12:03 - 12:21	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare	online appl for TXBC M lara and M lara (mr - BC appl; ms just letter of verification (which tx vital stats told me didn't exist)).	09/30/2013	12:22 - 12:52	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[R] Research, Legal	NC litigation	10/01/2013	12:51 - 13:51	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send	KG re rep agmt text for VID case	10/03/2013	15:28 - 15:46	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[T] Telephone call to...	JGArza re outreach	10/04/2013	13:21 - 13:39	[11064] Marinda van Dalen		0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[C] Conference w/ mike seifert re VID outreach	10/04/2013	13:40 - 14:40	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... teresa, Vital REcords, calling about bC req for Margarito Lara. Not found. some questions.	10/04/2013	14:60 - 15:18	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[L] Letter, draft/send ltr to cl	10/04/2013	17:08 - 17:14	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review cmplt's filed in corpus case; begin our cmplt	10/08/2013	18:53 - 20:53	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[R] Research, Legal public transportation in clients' communities.	10/09/2013	16:48 - 17:12	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[R] Research, Legal distances between clients, dps, etc.	10/09/2013	17:13 - 18:13	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) arrange client meetings	10/10/2013	17:33 - 17:51	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare plaintiffs section of cmplt	10/10/2013	17:52 - 21:52	[11064] Marinda van Dalen	4.0
VID07 85B-IND-Electio	[DP] Document - prepare cmplt pls facts	10/11/2013	17:05 - 19:05	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[TV] Travel raymondville, sebastian	10/15/2013	15:14 - 17:14	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ estella espinosa.	10/15/2013	17:15 - 18:15	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ laras	10/15/2013	18:16 - 19:16	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare cmplt, pls	10/15/2013	20:57 - 22:57	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ dgh, jg, kg, rdog re litigation. jg draft plgs. mvd, kg re-itv clients.	10/16/2013	09:11 - 09:53	[11064] Marinda van Dalen NC	0.7
VID07 85B-IND-Electio	[EM] Email, Draft / Send RD re cmplt	10/16/2013	09:54 - 10:06	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) docs from clients. organize.	10/16/2013	11:52 - 12:52	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ KG re meeting with clients	10/16/2013	12:53 - 13:23	[11064] Marinda van Dalen NC	0.5
VID07 85B-IND-Electio	[DP] Document - prepare prepare NB on Mendez; oul for meeting. update mm on facts. review docs.	10/16/2013	13:24 - 15:24	[11064] Marinda van Dalen NC	2.0
VID07 85B-IND-Electio	[DP] Document - prepare oul for client meetings - willacy county. prep NB for each.	10/16/2013	15:25 - 18:25	[11064] Marinda van Dalen NC	3.0

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**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

VID/Type	Code	Date	Time	Start	Stop	Hours
85B-IND-Electio	[C] Conference w/ mendez	10/17/2013	17:46	[11064] Marinda van Dalen		2.5
VID07 85B-IND-Electio	[TV] Travel sebastian	10/17/2013	17:47 - 19:47	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review KG mm on espinoza facts	10/17/2013	19:48 - 20:06	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[ASMT] Assignment KG call espinoza witnesses	10/17/2013	20:07 - 20:19	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send dgh re client mtgs	10/17/2013	20:20 - 20:32	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[TV] Travel willacy county	10/18/2013	15:17 - 17:17	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[C] Conference w/ espinoza	10/18/2013	17:18 - 18:18	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[C] Conference w/ laras	10/18/2013	18:19 - 20:49	[11064] Marinda van Dalen		2.5
VID07 85B-IND-Electio	[DOC] Document - receive/review KG mm on espinoza withn	10/18/2013	20:50 - 21:08	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) prep for outreach/client trip. review facts, prep admin docs, pack,etc.	10/20/2013	15:56 - 18:26	[11064] Marinda van Dalen	NC	2.5
VID07 85B-IND-Electio	[C] Conference w/ lionel estrada	10/23/2013	16:06 - 17:06	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[TV] Travel to meet with lionel estrada and return home.	10/23/2013	17:07 - 00:07	[11064] Marinda van Dalen		7.0
VID07 85B-IND-Electio	[DOC] Document - receive/review first draft of cmplt from JG. edit.	10/23/2013	00:08 - 01:08	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re first draft of cmplt	10/23/2013	01:09 - 01:21	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re VAN/list of pls and witnesses.	10/24/2013	16:09 - 16:21	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send RD re AA witnesses	10/24/2013	17:23 - 17:35	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[L] Letter, draft/send m gutierrez	10/24/2013	17:36 - 18:36	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[T] Telephone call to... juanita cox re litigation. update facts in cmplt about organization. discuss need for new admin docs.	10/25/2013	09:53 - 10:23	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re r hdz and LUPE	10/25/2013	10:24 - 10:36	[11064] Marinda van Dalen	NC	0.2



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**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File ID/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send PMcG re AA witnesses	10/25/2013	10:56 - 11:08	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send KG re LARA family hisoty - resesarch. C- re same	10/25/2013	11:09 - 11:27	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare edits to cmplt	10/25/2013	11:28 - 12:46	[11064] Marinda van Dalen	NC	1.3
VID07 85B-IND-Electio	[DP] Document - prepare additions/changes to pleadings re individual plaintiffs.	10/25/2013	12:47 - 15:47	[11064] Marinda van Dalen		3.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send juanita cox with new admin docs	10/28/2013	09:30 - 09:42	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[T] Telephone call to... voter reg offices, willacy, goliad, karnes. confirmed e. mendez, e. espinosa, l. lara registered to vote. willacy: new card, need to submit new voter reg appl. voter can do in person and, if have id, immed get new card (or spouse can do for person, maybe child). otherwise card will be mailed. can also submit appl by mail. goliad: can just call and they'll mail copy. karnes: can come in person or can mail written request. will be mailed to address on roll. sending out new cards in nov or dec. t- cydi hinojosa abotu getting someone up to sebastian to help mendez and lydia complete form and bring to registrars. she'll CB.	10/28/2013	10:39 - 11:39	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DP] Document - prepare cheat sheet clients. review accurint, idocket records.	10/28/2013	11:40 - 13:40	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[ASMT] Assignment AT re contacting provisional voters	10/29/2013	19:28 - 19:46	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review new cmplt draft. edits	10/29/2013	19:60 - 20:24	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send j cox new admin docs LUPE	10/29/2013	20:25 - 20:43	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare new draft of cmplt, edits.	10/30/2013	08:42 - 09:12	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[T] Telephone call to... NUECES County clerk re id nec'y to get BC. if no valid DL, need 3 acceptable forms of id. incl. voter reg card, ss card, and recent check stub and recent utility bill in his name. or parent or sibling with ID can pick up. Called re Taylor. Per clerk, if he doesn't have these, he should consult an attny - she doesn't know what an attorney would do.	11/01/2013	09:31 - 09:49	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[C] Conference w/ KG re new clients	11/01/2013	10:15 - 10:39	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[R] Research, Legal background taylor and ortiz	11/01/2013	11:24 - 12:54	[11064] Marinda van Dalen		1.5



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
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<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[C] Conference w/ cc re new pls/status (plus prep for same)	11/01/2013	11:55 - 13:55	[11064] Marinda van Dalen	1.8
VID07 85B-IND-Electio	[DP] Document - prepare edits to v6 cmplt	11/02/2013	11:39 - 12:57	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send Peter re Taylor facts. T re same.	11/03/2013	11:23 - 11:53	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare Significant Litigation Approval (Older Version)	11/04/2013	10:56 - 11:02	[11064] Marinda van Dalen	NC 0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review mPHV peter	11/04/2013	11:03 - 11:15	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[DP] Document - prepare cmplt v9 edits	11/05/2013	11:47 - 13:05	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[DOC] Document - receive/review order from ct; file.	11/06/2013	11:15 - 11:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ KG re Mendez voter reg card	11/07/2013	12:54 - 13:06	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review m dismiss veasey	11/08/2013	12:56 - 13:56	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ KG re docs from clients, client mtgs, intv Alcocers (witness?)	11/11/2013	13:25 - 13:43	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[C] Conference w/ kg re tdl	11/11/2013	13:44 - 13:56	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re experts	11/11/2013	13:57 - 14:15	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review summons	11/12/2013	13:32 - 13:44	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[ASMT] Assignment AT re filing	11/12/2013	13:45 - 13:57	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re veasey hearing, attendance, substance anticipated, etc.	11/13/2013	13:58 - 14:16	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[DP] Document - prepare edits to protective order	11/13/2013	14:17 - 15:17	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... JG re amending cmplt	11/13/2013	15:31 - 15:49	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare edits to first amended cmplt	11/13/2013	15:50 - 17:08	[11064] Marinda van Dalen	1.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
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File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[DP] Document - prepare edits, first amended cmplt	11/13/2013	13:48 - 15:06	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[T] Telephone call to... JG re hearing.	11/14/2013	15:07 - 15:19	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re conf call	11/18/2013	16:45 - 16:57	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[INV] Investigation request vital stat docs for espinosa. Investigation of [SUBJECT]	11/18/2013	18:12 - 18:30	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare SLAP	11/19/2013	17:59 - 18:59	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ conf call all pl non-gvt counsel. prep.	11/19/2013	18:60 - 20:30	[11064] Marinda van Dalen NC	1.5
VID07 85B-IND-Electio	[R] Research, Legal history of VRA. leg hist.	11/19/2013	20:31 - 00:01	[11064] Marinda van Dalen	3.5
VID07 85B-IND-Electio	[DOC] Document - receive/review new Vessey pldgs	11/20/2013	16:43 - 17:01	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare edits to CIP; email to JG	11/20/2013	17:02 - 17:20	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... trla CC re tdl	11/20/2013	17:21 - 17:33	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[INV] Investigation Lara family history to support birth in US. On line. Investigation of [SUBJECT]	11/20/2013	18:19 - 19:19	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ KG re tdl	11/20/2013	19:20 - 19:32	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[R] Research, Legal senate factors	11/21/2013	16:53 - 17:53	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... JG re memo to brennan center	11/21/2013	17:54 - 18:12	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review resp from vital stats re max lara. as- kg contact client	11/21/2013	18:13 - 18:31	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review summons	11/21/2013	18:32 - 18:44	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send KG re Max lara BC	11/22/2013	17:57 - 18:09	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare open records requests on provisional ballots	11/22/2013	19:30 - 21:00	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[DP] Document - prepare open record requests. email. provisional ballots	11/25/2013	17:52 - 18:10	[11064] Marinda van Dalen	0.3

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**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
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<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[C] Conference w/ kg re taylor contact nfo.	11/25/2013	18:11 - 18:23	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> provisional ballots, hidalgo cty. travis cty.	11/26/2013	20:20 - 20:44	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> JG, RD re experts, tdl	12/02/2013	16:09 - 16:27	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[T] Telephone call to...</b> RD re Jewell rate, etc.	12/02/2013	19:29 - 19:41	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[EM] Email, Draft / Send</b> jewell re rate, etc.	12/02/2013	19:42 - 19:48	[11064] Marinda van Dalen	0.1
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> dgh re unregistered BC clients facts; experts, litigation budget, TAJ calls.	12/02/2013	19:49 - 20:19	[11064] Marinda van Dalen	NC 0.5
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> provisional ballots, guadelupe county	12/03/2013	11:05 - 11:23	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> review travis cty provisional ballots. look for phone numbers in VAN, net. Call those whose prov ballots not counted.	12/04/2013	10:44 - 14:44	[11064] Marinda van Dalen	4.0
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> mm on travis cty voters spoke to with uncounted provisional ballots	12/04/2013	14:45 - 15:15	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[EM] Email, Draft / Send</b> CC re travis cty provisional voters calls.	12/04/2013	15:16 - 15:28	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[INV] Investigation</b> how to get good phone numbers - for provisional voters, FW clients, etc. Investigation of [SUBJECT]	12/05/2013	17:05 - 17:29	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[EM] Email, Draft / Send</b> RD re calls. TAJ, volunteer.	12/05/2013	17:30 - 17:42	[11064] Marinda van Dalen	NC 0.2
<b>VID07</b> 85B-IND-Electio	<b>[RO] Research, Non-Legal</b> numbers for travis county voters not counted	12/05/2013	17:43 - 18:13	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> call list, FW clients to call.	12/05/2013	18:27 - 20:27	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> hidalgo records - provisional ballots. check phone numbers.	12/05/2013	20:28 - 22:28	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[T] Telephone call to...</b> JG re provisional voter calls, experts, tuesday visit to rgv.	12/06/2013	10:21 - 10:33	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[T] Telephone call to...</b> dgh re experts and witnesses	12/06/2013	10:34 - 10:52	[11064] Marinda van Dalen	NC 0.3
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> KG re Lara plaintiffs cm6.	12/06/2013	11:06 - 11:24	[11064] Marinda van Dalen	0.3

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**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
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<b>FILED/Type</b>	<b>Code</b>	<b>Document - receive/review</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		guadelupe cty provisional voting records	12/06/2013	11:25 - 11:55	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[INV]</b>	Investigation espinosa birth place evid. Investigation of [SUBJECT]	12/06/2013	13:47 - 14:11	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[ASMT]</b>	Assignment AT set up client mtgs	12/09/2013	16:51 - 17:03	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[TV]</b>	Travel BRO to EBG and back to meet with Lavariega, expert.	12/10/2013	16:28 - 19:28	[11064] Marinda van Dalen	3.0
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ meet with willacy county clients. tv	12/10/2013	20:42 - 00:42	[11064] Marinda van Dalen	4.0
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... conf call re brief with counsel	01/03/2014	08:25 - 08:49	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review motion to dismiss - ortiz	01/03/2014	08:50 - 10:20	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... t and EM JG and RD re experts status	01/03/2014	10:40 - 11:10	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review resp NAACP to motion to dismiss	01/06/2014	08:25 - 09:25	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... JG re experts	01/06/2014	10:16 - 10:46	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ Jewell (plus prep)	01/07/2014	11:19 - 12:19	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ KG re espinosa docs	01/07/2014	12:20 - 12:38	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send JG re client mtgs sched	01/07/2014	12:39 - 12:51	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review schedluing order	01/07/2014	13:37 - 13:55	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review motion to consol	01/08/2014	12:32 - 12:50	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[CM]</b>	Case Management (org. file, etc.) sched clinet mtgs.	01/08/2014	12:51 - 13:09	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send KG and JG re cleint mtgs	01/08/2014	13:10 - 13:34	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send KG re espinozsa BC	01/08/2014	13:35 - 13:53	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[C] Conference w/ KG re espinosa BC	01/08/2014	13:54 - 14:06	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[ASMT] Assignment</b> AT contact Mendez re collateral legal problem	01/08/2014	14:07 - 14:25	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> client list for Jewell	01/08/2014	14:26 - 14:44	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> KG re Mendez call	01/08/2014	14:45 - 14:57	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> edits to first draft of brief (response to m to dismiss).	01/09/2014	12:47 - 15:17	[11064] Marinda van Dalen	2.5
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> other pls' briefing on m to dismiss	01/09/2014	15:18 - 17:18	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> dkt 143, 144. other pls' responses. stdg	01/10/2014	09:49 - 10:49	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[EM] Email, Draft / Send</b> KG re Taylor, ortiz pls	01/10/2014	10:50 - 11:02	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> Pls' Response. Review def brief to check what our draft missing for JG. Line edit. review briefs on other pls.	01/10/2014	11:03 - 15:33	[11064] Marinda van Dalen	4.5
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> Jewell and CC re expert report	01/13/2014	14:01 - 15:01	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> CC re brief	01/13/2014	15:15 - 15:27	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC] Document - receive/review</b> order consol	01/13/2014	15:28 - 15:40	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> KG re espinosa facts	01/13/2014	15:41 - 15:53	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> response to m to dismiss; final draft	01/13/2014	15:54 - 18:54	[11064] Marinda van Dalen	3.0
<b>VID07</b> 85B-IND-Electio	<b>[DP] Document - prepare</b> edits to igy DOJ; t-JG	01/14/2014	14:03 - 15:03	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[C] Conference w/</b> KG re client mtgs	01/14/2014	15:04 - 15:16	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[T] Telephone call to...</b> JG re client mtgs	01/14/2014	15:17 - 15:29	[11064] Marinda van Dalen	0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Description	Date	Time	Staff	Hours
85B-IND-Electio	[DOC] Document - receive/review jewell itv questios	01/15/2014	13:25 - 15:53	[11064] Marinda van Dalen	2.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) client contact	01/15/2014	15:54 - 16:12	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... JG re discov sched	01/16/2014	14:47 - 15:05	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send KN re Taylor	01/21/2014	10:11 - 10:23	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send jewell re clients	01/21/2014	10:43 - 11:01	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review TX resp to RFP; 2nd RFP	01/21/2014	11:15 - 11:39	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[C] Conference w/ jewell re questions for clietns; prep	01/22/2014	10:35 - 12:05	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[T] Telephone call to... CC re client mtgs	01/22/2014	12:06 - 12:24	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 148	01/22/2014	12:25 - 12:43	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... all pl counsel re strategy	01/22/2014	12:44 - 13:56	[11064] Marinda van Dalen NC	1.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re tdl	01/22/2014	13:57 - 14:15	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ KG re CC clients	01/22/2014	14:16 - 14:34	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re call in info on call	01/22/2014	14:35 - 14:41	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[T] Telephone call to... CC re client meetigns	01/22/2014	14:42 - 15:12	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C] Conference w/ Jewell	01/22/2014	15:32 - 16:32	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... JG re Jewell issues	01/22/2014	16:33 - 16:51	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ Estela Espinosa. go over jewell questions.	01/23/2014	11:17 - 12:17	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... Raymondville to meet Espinosa	01/23/2014	12:18 - 14:18	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[F] Facts investigation review espinosa facts to prep for mtg.	01/23/2014	14:19 - 14:49	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>VID/Type</b>	<b>Code</b>	<b>Telephone call to...</b>	<b>Date</b>	<b>Time</b>	<b>Start</b>	<b>Stop</b>	<b>Hours</b>
85B-IND-Electio		JG re giving Espinos BC	01/23/2014	11:00 - 15:27	[11064]	Marinda van Dalen	4.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review mm n espinos finances	01/24/2014	12:30 - 12:48	[11064]	Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review review facts, mendez and espinoza, prep jewell call	01/27/2014	13:27 - 14:27	[11064]	Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... jewell re prep of expert report	01/28/2014	11:47 - 12:47	[11064]	Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ KG re jewell questions	01/28/2014	12:48 - 13:06	[11064]	Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... jewell re expert report	01/28/2014	16:37 - 17:37	[11064]	Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ CC, DOJ, Dallas County.	01/28/2014	17:38 - 18:56	[11064]	Marinda van Dalen	1.3
<b>VID07</b> 85B-IND-Electio	[DP]	Document - prepare update jewell questionnaire	01/29/2014	12:20 - 12:38	[11064]	Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send reschedule jewell call	01/29/2014	12:58 - 13:10	[11064]	Marinda van Dalen	NC 0.2
<b>VID07</b> 85B-IND-Electio	[DP]	Document - prepare jewell questionnaire v.2.	01/29/2014	13:11 - 13:29	[11064]	Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ KG re status lydia lara	01/29/2014	13:43 - 13:55	[11064]	Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ PN re providers, Espinoza. What duties, reimbursed mileage, etc.	01/29/2014	13:56 - 14:14	[11064]	Marinda van Dalen	NC 0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review finances mendez	02/03/2014	14:30 - 15:00	[11064]	Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review dkt 150, 151	02/03/2014	15:01 - 16:07	[11064]	Marinda van Dalen	1.1
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send JG re expert schedule	02/04/2014	14:33 - 14:45	[11064]	Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ KG re Maximina facts	02/04/2014	15:47 - 16:05	[11064]	Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send KG, CC re Taylor status. multiple.	02/04/2014	16:06 - 16:36	[11064]	Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ Jewell	02/05/2014	13:50 - 14:50	[11064]	Marinda van Dalen	1.0



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Telephone call to...</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		jose garza. re DOJ position on schedule; pros and cons. hg thoughts. Jewell - what can rely upon , eg DC circuit decision.	02/05/2014	14:51 - 15:21	[11064] Marinda van Dalen	
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ KG re status of pls	02/07/2014	14:26 - 14:44	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... JG re hearing this week; position on trial date, discovery.	02/10/2014	14:09 - 14:27	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review incoming discovery req's from TX	02/10/2014	14:59 - 16:11	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review new docs from Mendez	02/10/2014	16:12 - 16:36	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ KG re pl profiles, doc's	02/10/2014	16:50 - 17:08	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[PR]	Press Release / Press Coverage oul for Jewell mtg	02/10/2014	17:09 - 17:33	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	[ASMT]	Assignment KG client itvs	02/10/2014	17:34 - 17:58	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... JG re hg	02/10/2014	18:18 - 18:42	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ K. Jewell. Prep (.5)	02/11/2014	11:42 - 13:12	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	[TV]	Travel BRO to CC for hg	02/11/2014	13:26 - 16:38	[11064] Marinda van Dalen	3.2
<b>VID07</b> 85B-IND-Electio	[R]	Research, Legal amended BD re espinosa	02/11/2014	17:60 - 18:18	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review estrada docs	02/11/2014	18:19 - 18:37	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... JG re hg	02/11/2014	18:38 - 18:56	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review review pldgs for hg	02/11/2014	18:57 - 19:57	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	[HG]	Hearing Hearing on [SUBJECT]	02/12/2014	11:46 - 12:58	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ cocounsel	02/12/2014	12:59 - 14:11	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	[TV]	Travel CC - BRO	02/12/2014	14:12 - 17:24	[11064] Marinda van Dalen	3.2
<b>VID07</b> 85B-IND-Electio	[F]	Facts investigation tried to find CC clients	02/12/2014	17:25 - 18:55	[11064] Marinda van Dalen	1.5



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File#</b>	<b>ID/Type</b>	<b>Code</b>	<b>Document - receive/review</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio			dkt 179, 180	02/13/2014	11:48 - 12:18	[11064] Marinda van Dalen	0.5
VID07		[C]	Conference w/ trla CC, tdl	02/13/2014	12:19 - 12:49	[11064] Marinda van Dalen	0.5
VID07		[DP]	Document - prepare finalize 2d ORR	02/13/2014	10:01 - 10:25	[11064] Marinda van Dalen	0.4
VID07		[T]	Telephone call to... Ezra Rosenberg, Michelle Yearly, Dechert, re document review. Ezra said we may need to do review on gender claim ourselves. Mlcelle said Deckert hopes to get help with review. They think they will dedicate 5 attorneys FT to review. Still assessing status of section 5 data; by MOnday hope to have update and plan for moving fwd.	02/14/2014	10:26 - 10:56	[11064] Marinda van Dalen	0.5
VID07		[C]	Conference w/ CC re agreed order	02/14/2014	11:41 - 12:11	[11064] Marinda van Dalen	0.5
VID07		[DOC]	Document - receive/review jewell draft rpt, v1.	02/14/2014	12:50 - 13:50	[11064] Marinda van Dalen	1.0
VID07		[HG]	Hearing schedule and discoveryHearing on [SUBJECT]	02/14/2014	13:51 - 15:21	[11064] Marinda van Dalen	1.5
VID07		[HGP]	Hearing Prep (court) sched and discovPrepared for court hearing on [SUBJECT]	02/18/2014	13:30 - 13:36	[11064] Marinda van Dalen	0.1
VID07		[EM]	Email, Draft / Send CC re Jewell call	02/18/2014	13:37 - 13:49	[11064] Marinda van Dalen	0.2
VID07		[EM]	Email, Draft / Send Jewell re espinosa	02/18/2014	14:21 - 15:03	[11064] Marinda van Dalen	0.7
VID07		[DOC]	Document - receive/review dkt 172-175	02/18/2014	15:04 - 15:22	[11064] Marinda van Dalen	0.3
VID07		[EM]	Email, Draft / Send many with PLS counsel re variety of issues, moitions and discovery	02/18/2014	15:42 - 15:54	[11064] Marinda van Dalen	0.2
VID07		[EM]	Email, Draft / Send re TX extension	02/18/2014	15:55 - 16:43	[11064] Marinda van Dalen	0.8
VID07		[T]	Telephone call to... Jewell re draft report, mendez	02/18/2014	16:44 - 19:14	[11064] Marinda van Dalen	2.5
VID07		[DP]	Document - prepare edit jewell report; review mendez docs, tdl to be able to vote.	02/18/2014	19:15 - 19:27	[11064] Marinda van Dalen	0.2
VID07		[EM]	Email, Draft / Send Jewell re calls on mendez tdl to vote	02/19/2014	13:34 - 14:04	[11064] Marinda van Dalen	0.5
VID07		[CM]	Case Management (org. file, etc.) ORR responses	02/19/2014	14:05 - 14:23	[11064] Marinda van Dalen	0.3
VID07		[DOC]	Document - receive/review dkt 176, 177				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	File	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send pl cc re experts (many)	02/18/2014	14:14 - 14:54	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review draft legislative privilege brief	02/19/2014	14:55 - 15:25	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) ORR responses	02/20/2014	13:31 - 14:01	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 178	02/20/2014	14:02 - 14:14	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re experts	02/20/2014	14:15 - 14:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review TX privilege logs	02/20/2014	14:34 - 15:04	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... JG re conf call with PI counsel; schedule and proof issues	02/20/2014	15:05 - 15:17	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... PI counsel. expert coordination; scheduling issues	02/20/2014	15:18 - 16:36	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 179, 180	02/21/2014	13:51 - 14:51	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare edits to legislative priv brief	02/24/2014	16:18 - 16:36	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... JG re leg priv brief	02/24/2014	16:37 - 16:49	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re brief leg priv	02/24/2014	16:50 - 17:02	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare signature block for leg priv br. t- RD re same. EM to pl CC.	02/24/2014	17:03 - 17:21	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re DOJ mtg	02/24/2014	17:22 - 17:34	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ Jewell re report. prep.	02/25/2014	16:25 - 17:25	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC reminder jewell	02/25/2014	17:26 - 17:32	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[EM] Email, Draft / Send jewell re mendez follow up	02/25/2014	17:33 - 17:51	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC, mult, re L Taylor, conference call with PL CC, experts.	02/25/2014	17:52 - 18:22	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... Jewell; prep	03/04/2014	16:57 - 18:15	[11064] Marinda van Dalen	1.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Telephone call to...	Date	Time	Status	Hours
85B-IND-Electio		JG re expert date	03/06/2014	19:29 - 19:47	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) review new filings, emails.	03/20/2014	10:06 - 10:36	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C]	Conference w/ call with pl counsel (weekly)	03/20/2014	10:37 - 11:37	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP]	Document - prepare tdl for call today	03/21/2014	10:06 - 10:36	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C]	Conference w/ jose, doggett re tdl	03/21/2014	10:37 - 11:37	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T]	Telephone call to... estella espinosa. explain depo, dates.	03/24/2014	16:07 - 16:31	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... kevin jewell. re missing info on pls. prep for call tomorrow with cc.	03/24/2014	16:32 - 16:44	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM]	Email, Draft / Send arrange depo location for willacy cty	03/24/2014	16:45 - 17:09	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... jose garza re depo schedule for pls, locations, mtgs, etc.	03/24/2014	17:10 - 17:40	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC]	Document - receive/review RFPD to pls	03/24/2014	17:41 - 18:11	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP]	Document - prepare review status of jewell report - what info he still needs	03/24/2014	18:12 - 18:42	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T]	Telephone call to... san anonio trla to arrange depo room	03/24/2014	19:14 - 19:26	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[T]	Telephone call to... knewell re r hdz status, itv	03/24/2014	19:27 - 19:45	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC]	Document - receive/review notice from ct re change in hg date; discuss with CC	03/24/2014	19:46 - 20:04	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP]	Document - prepare schedule for tdl, discovery, client mtgs, etc.	03/24/2014	20:05 - 20:47	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[DOC]	Document - receive/review review incoming ORR responses	03/24/2014	20:48 - 21:48	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T]	Telephone call to... Delma Lara re parents. Need to do Jewell itv, RFPD, depo prep for Margarito. Lydia is very sick - her white blood cells and hemo are too low for her to do chemo. she can't be around people due to impaired immune system. I'll call her Monday re trying to meet with her and Margarito somewhere other than their house next week (perhaps Friday).	03/25/2014	12:46 - 13:10	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... Jewell re expert rpt (.7);; prep for conversation	03/25/2014	13:11 - 14:53	[11064] Marinda van Dalen	1.7

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Description</b>	<b>Date</b>	<b>Time</b>	<b>Status</b>	<b>Hours</b>
VID07 85B-IND-Electio	[DOC] Document - receive/review jewell draft report	03/25/2014	14:54 - 15:24	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare draft R Hdz affid	03/25/2014	15:25 - 15:55	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... JG re objections to RFPDs	03/25/2014	15:56 - 16:14	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review RFPD to pls	03/25/2014	16:15 - 16:45	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review state brief on scheduling order	03/25/2014	17:36 - 17:54	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... RWD re client mtgs, RFPD	03/25/2014	17:55 - 18:25	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send TX re depo location	03/25/2014	18:26 - 18:38	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... lionel estrada. set up mtg. get status.	03/25/2014	18:39 - 18:57	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[L] Letter, draft/send estrada, confirm mtg	03/25/2014	18:58 - 19:16	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare objections to RFPD	03/25/2014	19:17 - 19:41	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) scheduling issues: covering client meetings, depositions with CC	03/26/2014	12:34 - 12:52	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re disclosures / discuss.	03/26/2014	13:12 - 13:30	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review discovery tracking chart	03/26/2014	13:31 - 13:55	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review veasey disclosures	03/26/2014	14:53 - 15:11	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review subpoena, health svcs	03/26/2014	15:12 - 15:30	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls' counsel re depo assmts	03/26/2014	15:44 - 15:56	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare tdl, update	03/27/2014	13:56 - 14:56	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... michelle yearly at dechert re doc review, themes, crevella west	03/27/2014	14:57 - 15:15	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... RWD re document review, pls' counsel call, depo issues, schedule, hearing,...	03/27/2014	15:16 - 15:46	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Telephone call to...</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		JG. Re conference call with pls counsel, client meetings, depo plans.	03/27/2014	16:27 - 16:55	[11064] Marinda van Dalen	
<b>VID07</b> 85B-IND-Electio	[C]	Conference w/ conference call, pls' counsel	03/27/2014	16:56 - 17:38	[11064] Marinda van Dalen	NC 0.7
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send JG re pls' counsel call	03/27/2014	17:39 - 17:51	[11064] Marinda van Dalen	NC 0.2
<b>VID07</b> 85B-IND-Electio	[R]	Research, Legal filing disclosures (federal rules, local rules, court orders, docket)	03/27/2014	17:52 - 18:10	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send PLS COUNSEL RE DOJ DEPOS	03/27/2014	18:11 - 18:23	[11064] Marinda van Dalen	NC 0.2
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send KG re client mtgs	03/27/2014	18:24 - 18:42	[11064] Marinda van Dalen	NC 0.3
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send pls' counsel re schedule issues	03/27/2014	18:43 - 19:01	[11064] Marinda van Dalen	NC 0.3
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review RFPD to LUPE; cf RFP to other pl gps	03/27/2014	19:02 - 20:26	[11064] Marinda van Dalen	1.4
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send CC re taylor BC	03/27/2014	21:17 - 21:29	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send JG re LUPE mtg.	03/27/2014	21:30 - 21:42	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	[HGP]	Hearing Prep (court) 4/1 hearing. Prepared for court hearing on [SUBJECT]	03/28/2014	13:57 - 14:27	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	[DP]	Document - prepare decl for taylor and ortiz for meetings next week	03/28/2014	14:28 - 14:58	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	[DP]	Document - prepare objections to indiv'l pls first requests from TX for docs.	03/28/2014	14:59 - 20:59	[11064] Marinda van Dalen	6.0
<b>VID07</b> 85B-IND-Electio	[DP]	Document - prepare decl ortiz and taylor to review with jewell	03/31/2014	16:17 - 17:41	[11064] Marinda van Dalen	1.4
<b>VID07</b> 85B-IND-Electio	[T]	Telephone call to... jewell re rpt	03/31/2014	17:42 - 18:42	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	[TV]	Travel BRO to CC for hearing	03/31/2014	18:43 - 22:07	[11064] Marinda van Dalen	3.4
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review US discovery responses	03/31/2014	23:53 - 00:23	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	[EM]	Email, Draft / Send JG re hdz	03/31/2014	00:24 - 00:36	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	[DOC]	Document - receive/review dkt 215-218	03/31/2014	00:56 - 01:26	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File ID/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	Hearing on [SUBJECT]; prep	04/01/2014	18:21 - 18:21	[11064] Marinda van Dalen	0.0
VID07 85B-IND-Electio	[TV] Travel CC to BRO	04/01/2014	18:22 - 21:34	[11064] Marinda van Dalen	3.2
VID07 85B-IND-Electio	[C] Conference w/ ortiz	04/01/2014	21:35 - 22:35	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ taylor	04/01/2014	22:36 - 23:54	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 219-222	04/01/2014	23:55 - 00:13	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send KG re client mtg	04/01/2014	00:14 - 00:32	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[TV] Travel to client mtgs	04/01/2014	00:33 - 01:33	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[TV] Travel rockport to CC for hearing	04/01/2014	01:34 - 02:16	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[DP] Document - prepare add new docs from Taylor to DB, etc.	04/02/2014	17:39 - 18:09	[11064] Marinda van Dalen NC	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re tdl	04/02/2014	18:41 - 18:59	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare new tdl	04/02/2014	18:60 - 19:18	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send KG, RD re estrada mtg	04/02/2014	19:19 - 19:31	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... RD re L estrad	04/03/2014	16:47 - 17:05	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ pls' counsel (prep too)	04/03/2014	17:06 - 18:06	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ CC (trla); tdl	04/03/2014	18:07 - 18:37	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls' counsel re hg	04/03/2014	18:38 - 18:50	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send RD re estrada	04/03/2014	18:51 - 19:03	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re depose, trla role	04/03/2014	19:23 - 19:41	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review doc index, db, piles to organize	04/03/2014	19:42 - 21:42	[11064] Marinda van Dalen	2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File #/Type</b>	<b>Code</b>	<b>Telephone call to...</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		delma lara re meeting with parents next week.	04/04/2014	15:02 - 15:15	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C]	Conference w/ KG re client meetings for discovery responses.	04/04/2014	15:16 - 15:40	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... crevella west re training	04/04/2014	15:41 - 15:53	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC]	Document - receive/review notices to dps, sos	04/04/2014	16:20 - 16:38	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send JG re AG ltr	04/04/2014	16:39 - 16:45	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[DOC]	Document - receive/review new estrada docs and facts	04/04/2014	16:46 - 17:10	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... RD re estrada	04/04/2014	17:11 - 17:29	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send crevella re training	04/04/2014	18:28 - 18:46	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... juanita cox re mtg, status	04/04/2014	18:47 - 19:05	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C]	Conference w/ KG re espinosa status	04/04/2014	19:06 - 19:18	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C]	Conference w/ call with TX, non-doj pls re trial protocol.	04/07/2014	10:55 - 11:19	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[TRAI]	Training - attend Crevella west. training and familiarizing.	04/07/2014	11:20 - 13:50	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[DP]	Document - prepare updated tdl; email to cc	04/07/2014	13:51 - 14:33	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[C]	Conference w/ KG re client meetings.	04/07/2014	14:34 - 14:58	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[C]	Conference w/ conference, trla cc	04/07/2014	14:59 - 15:59	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DOC]	Document - receive/review depo notices to our clietns	04/07/2014	16:31 - 16:49	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send TX re discovery issues	04/07/2014	17:15 - 17:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... juanita cox re discovery responses, mtg.	04/08/2014	10:05 - 10:17	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T]	Telephone call to... msg lindsey wolf TX AG re discovery	04/08/2014	10:18 - 10:30	[11064] Marinda van Dalen	0.2



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[C] Conference w/ k jewell (1.0); prep .5	04/08/2014	11:02 - 12:32	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[HG] Hearing Hearing on [SUBJECT]	04/08/2014	12:33 - 13:09	[11064] Marinda van Dalen	0.6
VID07 85B-IND-Electio	[TV] Travel sebastien	04/08/2014	13:10 - 15:10	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ laras	04/08/2014	15:11 - 16:41	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[T] Telephone call to... natasha k re discovery responses	04/08/2014	16:42 - 17:00	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ maximina	04/08/2014	17:01 - 18:01	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... lindsey wolf re discovery. extension on rfpd, espinosa and hdz depo. prep, t-jose re same.	04/09/2014	10:25 - 10:49	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[TV] Travel sebastien	04/09/2014	10:50 - 12:50	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ mendez.	04/09/2014	12:51 - 14:21	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) mtgs between jewell and clients	04/09/2014	17:14 - 17:44	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C] Conference w/ all pls counsel re trial	04/10/2014	13:10 - 14:10	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare disclosures	04/10/2014	15:57 - 16:57	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) set up client mtgs	04/10/2014	16:58 - 17:22	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send TX re discov deadlines, mult	04/10/2014	17:23 - 17:41	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send disclosures to all counsel	04/10/2014	18:26 - 18:44	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) hotel reservation	04/10/2014	18:45 - 19:03	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare objections, individual pls	04/10/2014	19:04 - 19:28	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re consel call on discovry objs and responses	04/10/2014	19:48 - 20:06	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... r doggett, jwesevich re working ith juanita cox, RFPD responses	04/11/2014	10:29 - 10:47	[11064] Marinda van Dalen	0.3



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[C] Conference w/ Juanita Cos, response to RFPD	04/11/2014	11:48 - 11:48	[11064] Marinda van Dalen	0.0
VID07 85B-IND-Electio	[TV] Travel BRO- San Juan - BRO for mtg with Juanita Cox	04/11/2014	11:49 - 14:49	[11064] Marinda van Dalen	3.0
VID07 85B-IND-Electio	[C] Conference w/ JG re tdl, priorities, etc.	04/11/2014	14:50 - 15:50	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review RFP to LUPE before mtg	04/11/2014	16:23 - 17:23	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[TV] Travel Rockport to Corpus, Corpus to Brownsville. looked for Ortiz and Taylor.	04/14/2014	16:14 - 21:14	[11064] Marinda van Dalen	5.0
VID07 85B-IND-Electio	[T] Telephone call to... JG re sched	04/14/2014	21:15 - 21:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... Jewell re client facts.	04/14/2014	21:34 - 21:46	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... Jewell re client facts	04/14/2014	21:47 - 21:59	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review ezra's advisory	04/14/2014	22:52 - 23:10	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ staff at senior center, looking for Taylor.	04/14/2014	23:11 - 23:23	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re depo sched	04/15/2014	16:19 - 16:31	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review recent filings	04/15/2014	17:35 - 18:05	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re pls' call topics	04/15/2014	18:06 - 18:18	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send L wolf re espinosa depo (mult)	04/15/2014	18:19 - 18:37	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send RWD re how produce docs	04/15/2014	18:38 - 18:56	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review reread VID cases (HOlder, Crawford, etc.)	04/15/2014	18:57 - 00:27	[11064] Marinda van Dalen	5.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send docs to LUPE re responses to RFP	04/16/2014	17:17 - 17:41	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) set up client mtgs	04/16/2014	17:42 - 18:00	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review review protective order and production order	04/16/2014	18:01 - 18:19	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Event	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send JG re production format	04/16/2014	18:30 - 18:32	[11064] Marinda van Dalen	0.0
VID07 85B-IND-Electio	[HG] Hearing Hearing on [SUBJECT]	04/16/2014	18:33 - 19:27	[11064] Marinda van Dalen	0.9
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re hearing	04/16/2014	19:28 - 19:40	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send kg re client mtgs	04/16/2014	20:50 - 21:02	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send all counsel re espinosa depo	04/16/2014	21:03 - 21:15	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare responses to tx discovery, objections, responses	04/16/2014	21:16 - 23:16	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send cc re taylor health, etc.	04/17/2014	07:58 - 08:10	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send peter mcgraw re taylor	04/17/2014	08:11 - 08:23	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... peter mcgraw re LT status	04/17/2014	08:24 - 08:36	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ JG re discov to serve	04/17/2014	08:37 - 08:55	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... trla cc re discov issues	04/17/2014	09:21 - 10:21	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... all pls counsel	04/17/2014	10:22 - 12:22	[11064] Marinda van Dalen NC	2.0
VID07 85B-IND-Electio	[C] Conference w/ RWD re discov	04/17/2014	12:48 - 13:18	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare discov responses , RFP LUPE	04/17/2014	13:38 - 16:08	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[DOC] Document - receive/review 3rd rfp to LUPE	04/18/2014	08:03 - 08:27	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review depo n, lupe	04/18/2014	08:28 - 08:40	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re depo, lupe	04/18/2014	08:41 - 08:53	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ Jewell. Prep for same (review docs/client facts)	04/18/2014	08:54 - 10:54	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re ortiz MIA	04/21/2014	09:13 - 09:25	[11064] Marinda van Dalen	0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Event	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send Jewell	04/21/2014	09:26 - 09:38	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ JG re tdl	04/21/2014	10:11 - 10:29	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... 2x with lindsey wolf re discovery extensions.	04/21/2014	11:01 - 11:19	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG, RG re discovery issues (depo dates, extensions, etc)	04/21/2014	11:20 - 11:32	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... JG re discovery responses	04/21/2014	11:33 - 11:51	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ KG re discovery, meeting with clients.	04/21/2014	11:52 - 12:10	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send Juanita Cox re RFPD from TX	04/21/2014	12:43 - 13:07	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review Juanita Cox depo from DC lit'n.	04/21/2014	13:08 - 14:08	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... Jewell	04/22/2014	10:27 - 10:57	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare prep for call with jewell	04/22/2014	10:58 - 11:28	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... RWD re tdl	04/22/2014	13:09 - 13:33	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[C] Conference w/ JG, RWD re ingram depo, other depos, tdl	04/23/2014	09:30 - 10:00	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C] Conference w/ KG re client mtgs	04/23/2014	10:32 - 10:50	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send trla team re deadlines, etc.	04/23/2014	11:16 - 11:34	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare LUPE responses to rfp	04/23/2014	11:35 - 12:53	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send KG re client mtgs	04/23/2014	12:54 - 13:12	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare assemble docs, LUPE resp	04/23/2014	13:13 - 14:13	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send Juanita re discovery	04/24/2014	09:34 - 09:52	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re docs to produce	04/24/2014	09:50 - 10:12	[11064] Marinda van Dalen	0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[DP] Document - prepare objections to 1st RFP, LUPE	04/24/2014	10:13 - 12:31	[11064] Marinda van Dalen	2.3
VID07 85B-IND-Electio	[DP] Document - prepare pdf for indiv pls to produce	04/24/2014	13:16 - 13:34	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ pls counsel call	04/25/2014	09:41 - 11:11	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re espinosa depo (mult)	04/25/2014	11:12 - 11:36	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send trla re deadlines	04/25/2014	11:37 - 11:49	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[C] Conference w/ KG re mendez, laras	04/25/2014	11:50 - 12:08	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... natasha, naacp, re discov	04/25/2014	12:09 - 12:27	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review tx ltr to tlyvef re discov productions	04/25/2014	12:28 - 12:40	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send JG re production format, redaction	04/25/2014	12:41 - 12:59	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[TV] Travel sebastian round trip to meet with clients.	04/28/2014	12:42 - 14:42	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ lydia lara, margo lara, e. mendez.	04/28/2014	14:43 - 16:43	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[T] Telephone call to... jewell - re client facts	04/28/2014	16:44 - 17:14	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) confirm client meetings	04/28/2014	17:15 - 17:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... RWD re discovery responses due this week	04/28/2014	17:34 - 17:58	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DP] Document - prepare organize new docs from clients; review	04/28/2014	18:18 - 18:48	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare docs from LUPE website	04/28/2014	18:49 - 19:07	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send juanita re mtg	04/28/2014	19:08 - 19:20	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re document production	04/28/2014	19:21 - 19:33	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review n espinosa depo	04/28/2014	19:34 - 19:46	[11064] Marinda van Dalen	0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File ID/Type</b>	<b>Code</b>	<b>Document - receive/review</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		response to m to quosh, legislators	04/28/2014	19:05 - 20:05	[11064] Marinda van Dalen	
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ BRO staff re doc production logistics	04/28/2014	20:06 - 20:36	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare discov RFPs to serve on TX	04/28/2014	20:37 - 21:07	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare review docs assembled for service on TX	04/28/2014	21:08 - 21:38	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare discovery responses due this week	04/28/2014	21:39 - 23:39	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[TV]</b>	Travel san juan	04/29/2014	12:48 - 15:36	[11064] Marinda van Dalen	2.8
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ Juanita, Jose (prep too)	04/29/2014	15:37 - 17:37	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... Jewell re facts/analysis	04/29/2014	17:38 - 17:50	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ get extension from wolf on producing docs	04/29/2014	19:23 - 19:35	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review read cox depo from section five case	04/29/2014	19:36 - 21:06	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send Andrews cty re ORR	04/29/2014	21:07 - 21:19	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review reread RFP to LUPE	04/29/2014	21:20 - 22:32	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review ingram depo transcript	04/29/2014	22:33 - 00:03	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send wolf re LUPE depo	04/30/2014	13:35 - 13:47	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review WI decision; prep summary	04/30/2014	16:02 - 17:14	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare responsive docs to produce to texas	04/30/2014	17:15 - 18:45	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare m dismiss R Hdz, order. finalize and AS to AT to file.	04/30/2014	18:46 - 19:16	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review US resp to 4th RFP; vesasey pls discov responses served today; LULAC's responses.	04/30/2014	19:17 - 21:47	[11064] Marinda van Dalen	2.5
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send co-counsel re doc review	05/01/2014	14:38 - 14:56	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File ID/Type</b>	<b>Description</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
VID07 85B-IND-Electio	[DOC] Document - receive/review tlyvef discovery responses	05/01/2014	14:52 - 15:27	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[CC] Conflicts Check CC, DOJ	05/01/2014	15:28 - 17:28	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[HG] Hearing Hearing on [SUBJECT]	05/01/2014	17:29 - 18:29	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) ORR responses	05/01/2014	18:30 - 18:54	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T] Telephone call to... RWD re discovery due this week	05/01/2014	18:55 - 19:13	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send cc re discovry issues	05/01/2014	19:14 - 19:32	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare objections to TX RFPs to our clients.	05/01/2014	19:33 - 04:51	[11064] Marinda van Dalen	9.3
VID07 85B-IND-Electio	[C] Conference w/ cc re document review	05/02/2014	14:41 - 14:59	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ KG re client status	05/02/2014	14:60 - 15:24	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T] Telephone call to... jewell re client itvs	05/02/2014	15:25 - 15:43	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review veasey pls 2d rfp to texas	05/02/2014	15:57 - 16:27	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send yeary re LUPE discovery from section 5	05/02/2014	16:47 - 17:05	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send Juanita re discovery, multiple	05/02/2014	17:06 - 17:24	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare notice to appear KN, PN, file.	05/02/2014	17:25 - 17:55	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare tdl	05/05/2014	16:41 - 17:41	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare rfps to texas	05/05/2014	17:42 - 19:12	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review emails on depos pls will take; t-rwd re same	05/05/2014	19:13 - 19:43	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... jg re sched, etc.	05/05/2014	20:15 - 20:33	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ kg re mts with clients	05/05/2014	20:34 - 20:52	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>File ID/Type</b>	<b>Code</b>	<b>Conference w/</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio		at, kg re discovery responses/orr	05/05/2014	21:53 - 21:23	[11064] Marinda van Dalen	
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review review dhhs docs on individual pls	05/05/2014	21:24 - 22:24	[11064] Marinda van Dalen	1.0
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare docs to produce to texas; review carefully	05/05/2014	22:25 - 23:55	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... jewell	05/06/2014	16:44 - 17:26	[11064] Marinda van Dalen	0.7
<b>VID07</b> 85B-IND-Electio	<b>[TV]</b>	Travel raymondville	05/06/2014	18:58 - 20:58	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ espinosa	05/06/2014	20:59 - 22:11	[11064] Marinda van Dalen	1.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review reciew espinosa docs for mtg	05/06/2014	22:12 - 22:36	[11064] Marinda van Dalen	0.4
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... jewell	05/06/2014	22:37 - 22:49	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... jose re tdl	05/06/2014	22:50 - 23:08	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ rwd re doj docs from counties.	05/06/2014	23:09 - 23:27	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare rfp to texas; em to trla cc.	05/06/2014	23:28 - 01:28	[11064] Marinda van Dalen	2.0
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b>	Email, Draft / Send jose re leg depos	05/07/2014	16:47 - 16:59	[11064] Marinda van Dalen	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review subpoenas to leg's	05/07/2014	16:60 - 18:06	[11064] Marinda van Dalen	1.1
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... RWD re leg depos	05/07/2014	19:08 - 19:26	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review draft conset order	05/07/2014	19:40 - 19:58	[11064] Marinda van Dalen	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b>	Document - prepare docs to produce to state; bate stamping issues, etc.	05/07/2014	20:24 - 22:54	[11064] Marinda van Dalen	2.5
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b>	Document - receive/review review docs from LUPE to produce to texas	05/08/2014	12:08 - 13:38	[11064] Marinda van Dalen	1.5
<b>VID07</b> 85B-IND-Electio	<b>[T]</b>	Telephone call to... RWD re LUPE docs; t-dgh re same; c-KY re same.	05/08/2014	13:39 - 14:09	[11064] Marinda van Dalen	0.5
<b>VID07</b> 85B-IND-Electio	<b>[C]</b>	Conference w/ dgh re LUPE docs	05/08/2014	14:10 - 14:40	[11064] Marinda van Dalen	NC 0.5



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

Case ID/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send wolf re doc production	05/09/2014	17:00 - 17:12	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare cover ltr for docs produced	05/09/2014	17:13 - 17:25	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ KG, AT re emails to produce; final production logistics and decision.	05/09/2014	17:26 - 17:44	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf with ORT 1-15; serve other parties.	05/09/2014	17:45 - 18:15	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re production order	05/09/2014	18:16 - 18:28	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare docs to produce from lupe; em to juanita re same.	05/09/2014	18:29 - 18:59	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send jose re emails to produce.	05/09/2014	18:60 - 19:12	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... juanita re doc's to produce to texas. only concern names of organizations/individuals in email re press release and names of organizations in GOTV doc.	05/12/2014	10:24 - 10:42	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... pls counsel (non-doj) re discov issues, call with TX	05/12/2014	10:43 - 11:43	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... TX re discov issues, with other non-doj pls	05/12/2014	11:44 - 12:44	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... Lindsey wolf re discovery issues.	05/12/2014	12:45 - 12:57	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare summary of tx v. holder on expert issues	05/12/2014	14:59 - 15:29	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send rwd re data production	05/12/2014	16:21 - 16:33	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re judicial notice opp	05/12/2014	16:34 - 16:46	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review ltr from tx - meet and confer	05/12/2014	16:47 - 17:05	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review veay pls discov responses	05/12/2014	17:06 - 17:30	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send email from counsel on discovery issues	05/12/2014	17:31 - 18:01	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... JG re hearing, leg depos	05/13/2014	10:32 - 10:50	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[TXT] Text to RD re Jose leave, hearing	05/13/2014	10:51 - 10:57	[11064] Marinda van Dalen NC	0.1



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File#	ID/Type	Code	Telephone call to...	Date	Time	Staff	Hours
85B-IND-Electio	VID07	[T]	Telephone call to... jewell re declarations, expert on cost coordination	05/13/2014	11:29	[11064] Marinda van Dalen	0.4
85B-IND-Electio	VID07	[EM]	Email, Draft / Send rwd re conversation with natasha	05/13/2014	12:21 - 12:33	[11064] Marinda van Dalen	0.2
85B-IND-Electio	VID07	[L]	Letter, draft/send cover ltrs for outgoing discvoery	05/13/2014	12:53 - 13:05	[11064] Marinda van Dalen	0.2
85B-IND-Electio	VID07	[T]	Telephone call to... bruce, doj re docs mailed to doj from ctys by trla.	05/13/2014	13:06 - 13:24	[11064] Marinda van Dalen	0.3
85B-IND-Electio	VID07	[TV]	Travel CC for hg	05/14/2014	21:04 - 00:34	[11064] Marinda van Dalen	NC 3.5
85B-IND-Electio	VID07	[DP]	Document - prepare rfps to texas	05/14/2014	00:54 - 01:24	[11064] Marinda van Dalen	0.5
85B-IND-Electio	VID07	[EM]	Email, Draft / Send cc re svc of docs served on texas in response to discovery requests	05/14/2014	01:25 - 01:37	[11064] Marinda van Dalen	NC 0.2
85B-IND-Electio	VID07	[HGP]	Hearing Prep (court) for next day.	05/14/2014	01:51 - 05:51	[11064] Marinda van Dalen	NC 4.0
85B-IND-Electio	VID07	[HG]	Hearing Hearing	05/15/2014	21:07 - 22:07	[11064] Marinda van Dalen	NC 1.0
85B-IND-Electio	VID07	[T]	Telephone call to... JG re hg	05/15/2014	22:08 - 22:20	[11064] Marinda van Dalen	0.2
85B-IND-Electio	VID07	[T]	Telephone call to... avi shapiro, doj, re affected persons, witness id.	05/15/2014	22:21 - 22:51	[11064] Marinda van Dalen	0.5
85B-IND-Electio	VID07	[TV]	Travel CC to BRO	05/15/2014	22:52 - 02:22	[11064] Marinda van Dalen	NC 3.5
85B-IND-Electio	VID07	[EM]	Email, Draft / Send cc re data expert	05/16/2014	21:35 - 21:47	[11064] Marinda van Dalen	0.2
85B-IND-Electio	VID07	[EM]	Email, Draft / Send cc re trial protocol	05/16/2014	21:48 - 22:12	[11064] Marinda van Dalen	0.4
85B-IND-Electio	VID07	[EM]	Email, Draft / Send rwd re witness id'n - TX BC problem experts	05/16/2014	22:13 - 22:31	[11064] Marinda van Dalen	0.3
85B-IND-Electio	VID07	[C]	Conference w/ KG re client mtgs; c- PN re availablility	05/16/2014	22:32 - 22:56	[11064] Marinda van Dalen	0.4
85B-IND-Electio	VID07	[DP]	Document - prepare edits to armand's igys to tx.	05/16/2014	22:57 - 23:15	[11064] Marinda van Dalen	0.3
85B-IND-Electio	VID07	[DOC]	Document - receive/review 3rd RFP from TX to LUPE	05/19/2014	09:01 - 09:25	[11064] Marinda van Dalen	0.4

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

FILED/Type	Event	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send Juanita, LUPE re 3rd RFP (multiple)	05/19/2014	09:26 - 09:50	[11064] Marinda van Dalen	
VID07 85B-IND-Electio	[DP] Document - prepare RFP to TX	05/19/2014	09:51 - 10:51	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) arrange client mtgs for dep prep, decl prep.	05/19/2014	10:52 - 11:22	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send Jewell re status rpt, decl's, itvs (mult)	05/20/2014	09:07 - 09:37	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... DOJ re disks mailed, county records	05/20/2014	09:38 - 09:56	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare LUPE resp to 3 RFP	05/20/2014	09:57 - 10:27	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review amended depo n LUPE	05/20/2014	10:28 - 10:58	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) set up client mtgs.	05/20/2014	10:59 - 11:29	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[DP] Document - prepare tdl	05/20/2014	11:30 - 11:48	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[HG] Hearing US m to quosh. call in early, review docs. Hearing on motion	05/20/2014	11:49 - 12:49	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare proposed draft response on C.I.P.	05/21/2014	09:10 - 09:28	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ KG, AT re discovery format issues	05/21/2014	09:29 - 09:47	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send Juanita re membership lists.	05/21/2014	09:48 - 10:06	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review new docs from laras.	05/21/2014	10:07 - 10:31	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DP] Document - prepare responses to TX 3rd RFP.	05/21/2014	10:32 - 13:02	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[T] Telephone call to... lindsey wolf re discovery issues in list on letter.	05/21/2014	13:03 - 13:57	[11064] Marinda van Dalen	0.9
VID07 85B-IND-Electio	[T] Telephone call to... RD re tdl	05/21/2014	13:58 - 14:28	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare decl, maximina	05/21/2014	14:29 - 15:29	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare decl max lara for meeting KG, PN	05/21/2014	15:30 - 16:00	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

FILED/Type	Code	Case Management (org. file, etc.)	Date	Time	Staff	Hours
85B-IND-Electio		schedule depos maximina lara and margarito	05/21/2014	16:26 - 16:50	[11064] Marinda van Dalen	
VID07 85B-IND-Electio	[T]	Telephone call to... raymondville depo location	05/21/2014	16:51 - 17:03	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T]	Telephone call to... pls counsel re CI privilege, discovery responses and TX meet and confers	05/21/2014	17:04 - 17:28	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... pls counsel re CIP	05/22/2014	10:39 - 11:03	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T]	Telephone call to... cocounsel re jewell rpt	05/22/2014	11:04 - 11:22	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) arrange client mtgs for depo prep, delc.	05/22/2014	11:23 - 11:47	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[EM]	Email, Draft / Send pls counsel / TX re logging, CIP. mult	05/22/2014	11:48 - 12:18	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) confirm depo location.	05/22/2014	12:19 - 12:37	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... emma simpson re texas response to RFP on individual pls. will get us estella espinosa and margo by tues; remainder by friday. will contact if need additional identifying info.	05/22/2014	12:38 - 12:56	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... jewell re report	05/22/2014	12:57 - 13:27	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T]	Telephone call to... RD re tdl	05/22/2014	13:28 - 13:46	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T]	Telephone call to... maximina. no asw	05/22/2014	13:47 - 13:59	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP]	Document - prepare docs on M lara for KJ	05/22/2014	13:60 - 14:30	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP]	Document - prepare resp to 3rd RFP to LUPE. serve.	05/22/2014	14:31 - 15:31	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T]	Telephone call to... Mendez to arrange depo. good june 19 or 20. at house or at home.	05/22/2014	15:32 - 15:50	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C]	Conference w/ conference tx and other non-doj pls groups on outstanding discovery texas wants issues.	05/22/2014	15:51 - 17:09	[11064] Marinda van Dalen	1.3
VID07 85B-IND-Electio	[T]	Telephone call to... lindesy wolf re depos. mult	05/22/2014	17:10 - 17:28	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send pls counsel re membership / logging/ CIP	05/23/2014	10:42 - 11:06	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM]	Email, Draft / Send pls counsel re individula pls depos	05/23/2014	11:07 - 11:31	[11064] Marinda van Dalen	0.4

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	11:56	[11064] Marinda van Dalen	
	TX re SOS, DPS docs needed for deopos. em ls counsel re same.				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/23/2014	11:57 - 12:15	[11064] Marinda van Dalen	NC 0.3
	set up mgs with clients.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	12:16 - 12:34	[11064] Marinda van Dalen	NC 0.3
	wolf re document format issues				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/23/2014	12:35 - 12:53	[11064] Marinda van Dalen	0.3
	new depo date maximina as req'd by tx				
VID07 85B-IND-Electio	[R] Research, Legal	05/23/2014	12:54 - 13:54	[11064] Marinda van Dalen	1.0
	depo objections, attny/client priv, relevance.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	13:55 - 14:13	[11064] Marinda van Dalen	0.3
	juanita re new depo notice				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/23/2014	14:14 - 14:32	[11064] Marinda van Dalen	0.3
	depo date estrada				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	14:33 - 14:51	[11064] Marinda van Dalen	0.3
	texas add'l info re espinoase for SOS/DPS docs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	14:52 - 15:04	[11064] Marinda van Dalen	0.2
	TX re maximina depo date				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	15:05 - 15:23	[11064] Marinda van Dalen	0.3
	yeary and aclu re LUPE discovery				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/23/2014	15:24 - 15:42	[11064] Marinda van Dalen	0.3
	emma simson re igy's reci'd, number				
VID07 85B-IND-Electio	[T] Telephone call to...	05/23/2014	16:14 - 16:32	[11064] Marinda van Dalen	0.3
	lindsey wolf - re maximina depo,lupe depo notice, lydia lara, depo on written q's.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/23/2014	16:33 - 16:51	[11064] Marinda van Dalen	0.3
	armand an demma simpson re TX production of docs before depos				
VID07 85B-IND-Electio	[T] Telephone call to...	05/23/2014	16:52 - 17:10	[11064] Marinda van Dalen	0.3
	RD re indiv pls depos, objections, attny/client q's , etc.				
VID07 85B-IND-Electio	[R] Research, Legal	05/23/2014	17:11 - 17:41	[11064] Marinda van Dalen	0.5
	depo - conferring with client privileged, what can direct not to answ on , procedure whne problme.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/26/2014	11:46 - 12:04	[11064] Marinda van Dalen	0.3
	juanita re depo				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/26/2014	12:05 - 12:23	[11064] Marinda van Dalen	0.3
	client appts				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/26/2014	12:24 - 12:36	[11064] Marinda van Dalen	0.2
	KN re doc review				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/26/2014	12:37 - 13:07	[11064] Marinda van Dalen	0.5
	espinosa docs in prep for depo				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[DP] Document - prepare	05/26/2014	13:08 - 15:08	[11064] Marinda van Dalen	2.0
	oul to prep client; based on clark depo.				
VID07 85B-IND-Electio	[DP] Document - prepare	05/26/2014	15:09 - 16:33	[11064] Marinda van Dalen	1.4
	review and add questions for jewell decl's				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	11:48 - 12:12	[11064] Marinda van Dalen	0.4
	serve TX with new docs re margo and estela. serve other parties as well.				
VID07 85B-IND-Electio	[DP] Document - prepare	05/27/2014	12:13 - 13:31	[11064] Marinda van Dalen	1.3
	docs to serve on texas today.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	13:32 - 13:50	[11064] Marinda van Dalen	0.3
	TX re meet and confer				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	13:51 - 14:09	[11064] Marinda van Dalen	0.3
	TX re mendez depo				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	14:10 - 14:22	[11064] Marinda van Dalen	0.2
	TX re production of docs				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/27/2014	14:23 - 14:41	[11064] Marinda van Dalen	0.3
	client meetings this week				
VID07 85B-IND-Electio	[T] Telephone call to...	05/27/2014	15:32 - 15:50	[11064] Marinda van Dalen	0.3
	KN re THHS docs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	16:16 - 16:34	[11064] Marinda van Dalen	0.3
	CC re taylor status				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/27/2014	16:35 - 16:47	[11064] Marinda van Dalen	NC 0.2
	omni booking				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	16:48 - 17:00	[11064] Marinda van Dalen	0.2
	juanita re depo				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	17:01 - 17:19	[11064] Marinda van Dalen	0.3
	Pls counsel re membership lists, logs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/27/2014	17:20 - 17:38	[11064] Marinda van Dalen	0.3
	wolf re lupe, dps and sos docs				
VID07 85B-IND-Electio	[T] Telephone call to...	05/27/2014	17:39 - 17:57	[11064] Marinda van Dalen	0.3
	jewell re maximina				
VID07 85B-IND-Electio	[T] Telephone call to...	05/27/2014	17:58 - 18:28	[11064] Marinda van Dalen	NC 0.5
	wolf re disocvery issues; multiple emails re same.				
VID07 85B-IND-Electio	[TV] Travel	05/28/2014	13:09 - 16:09	[11064] Marinda van Dalen	3.0
	Willacy county				
VID07 85B-IND-Electio	[C] Conference w/	05/28/2014	16:10 - 19:10	[11064] Marinda van Dalen	3.0
	margo lara, estela espinosa. depo prep				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/28/2014	19:11 - 19:41	[11064] Marinda van Dalen	0.5
	review new filings, docket.				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Status</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send	05/28/2014	19:42 - 19:54	[11064] Marinda van Dalen	0.2
VID07	juanita re depo date				
85B-IND-Electio	[EM] Email, Draft / Send	05/28/2014	19:55 - 20:07	[11064] Marinda van Dalen	0.2
VID07	confrim depo rm				
85B-IND-Electio	[T] Telephone call to...	05/28/2014	20:08 - 21:08	[11064] Marinda van Dalen	1.0
VID07	RWD re depos; c- PN re same. evidence issues.				
85B-IND-Electio	[EM] Email, Draft / Send	05/28/2014	21:09 - 21:27	[11064] Marinda van Dalen	0.3
VID07	wolf re deos				
85B-IND-Electio	[DOC] Document - receive/review	05/28/2014	21:28 - 22:28	[11064] Marinda van Dalen	1.0
VID07	DPS, SOS docs on margo and estella				
85B-IND-Electio	[DP] Document - prepare	05/28/2014	22:29 - 22:59	[11064] Marinda van Dalen	0.5
VID07	re-direct estela for depo				
85B-IND-Electio	[TV] Travel	05/29/2014	13:18 - 16:18	[11064] Marinda van Dalen	3.0
VID07	Willacy county				
85B-IND-Electio	[DEP] Deposition - Take	05/29/2014	16:19 - 18:49	[11064] Marinda van Dalen	2.5
VID07	estella espinosa.Deposed [NAME]				
85B-IND-Electio	[C] Conference w/	05/29/2014	18:50 - 19:20	[11064] Marinda van Dalen	0.5
VID07	estela before depo				
85B-IND-Electio	[CM] Case Management (org. file, etc.)	05/29/2014	19:21 - 19:51	[11064] Marinda van Dalen	0.5
VID07	review emails and new filings.				
85B-IND-Electio	[DOC] Document - receive/review	05/29/2014	19:52 - 20:52	[11064] Marinda van Dalen	1.0
VID07	SOS, DPS docs for Margo Lara				
85B-IND-Electio	[C] Conference w/	05/29/2014	20:53 - 22:29	[11064] Marinda van Dalen	1.6
VID07	conference call with pls' counsel				
85B-IND-Electio	[TV] Travel	05/30/2014	13:21 - 16:21	[11064] Marinda van Dalen	3.0
VID07	willacy county, depos				
85B-IND-Electio	[DEP] Deposition - Take	05/30/2014	16:22 - 19:22	[11064] Marinda van Dalen	3.0
VID07	margo; final prep and pick up.Deposed				
85B-IND-Electio	[EM] Email, Draft / Send	05/30/2014	19:23 - 19:35	[11064] Marinda van Dalen	0.2
VID07	juanita re depo n				
85B-IND-Electio	[T] Telephone call to...	05/30/2014	19:36 - 22:00	[11064] Marinda van Dalen	2.4
VID07	pls counsel re response to RFA's (1.2); prep for same, reviewing RFA's and making notes (.7); researching non-citizen voting in texas. (.5).				
85B-IND-Electio	[R] Research, Legal	06/02/2014	21:56 - 23:26	[11064] Marinda van Dalen	1.5
VID07	discoverability of LUPE membership				
85B-IND-Electio	[T] Telephone call to...	06/02/2014	23:27 - 23:57	[11064] Marinda van Dalen	0.5
VID07	RD re discovery issues; outstanding discovery responses.				
85B-IND-Electio	[T] Telephone call to...	06/02/2014	23:58 - 00:58	[11064] Marinda van Dalen	1.0
VID07	Brennan Center, Vishal re witness identification; follow up.				



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File#	ID/Type	Code	Telephone call to...	Date	Time	Staff	Hours
85B-IND-Electio			RWD re LUPE depo prep	06/03/2014	23:00 - 24:00	[11064] Marinda van Dalen	
VID07		[EM] Email, Draft / Send		06/03/2014	24:01 - 00:19	[11064] Marinda van Dalen	0.3
85B-IND-Electio			Pls counsel (non-DOJ) re RFA responses				
VID07		[T] Telephone call to...		06/03/2014	00:39 - 01:09	[11064] Marinda van Dalen	0.5
85B-IND-Electio			Jose re status, depositions.				
VID07		[EM] Email, Draft / Send		06/04/2014	22:00 - 22:30	[11064] Marinda van Dalen	0.5
85B-IND-Electio			KG, PN multiple re client mtgs				
VID07		[EM] Email, Draft / Send		06/04/2014	22:31 - 22:49	[11064] Marinda van Dalen	0.3
85B-IND-Electio			lupe re depo prep				
VID07		[DP] Document - prepare		06/04/2014	22:50 - 23:20	[11064] Marinda van Dalen	0.5
85B-IND-Electio			estrada decl				
VID07		[DP] Document - prepare		06/04/2014	23:21 - 00:51	[11064] Marinda van Dalen	1.5
85B-IND-Electio			Mendez decl				
VID07		[DP] Document - prepare		06/04/2014	00:52 - 03:22	[11064] Marinda van Dalen	2.5
85B-IND-Electio			profiles of clients for trial				
VID07		[EM] Email, Draft / Send		06/05/2014	22:04 - 22:22	[11064] Marinda van Dalen	0.3
85B-IND-Electio			juanita re depo				
VID07		[T] Telephone call to...		06/05/2014	22:23 - 23:41	[11064] Marinda van Dalen	1.3
85B-IND-Electio			Juanita re depo. (inlc .5 prep).				
VID07		[DP] Document - prepare		06/05/2014	23:42 - 01:12	[11064] Marinda van Dalen	1.5
85B-IND-Electio			Laras' docs to produce				
VID07		[DP] Document - prepare		06/05/2014	01:13 - 03:43	[11064] Marinda van Dalen	2.5
85B-IND-Electio			mendez decl final				
VID07		[T] Telephone call to...		06/05/2014	03:44 - 04:08	[11064] Marinda van Dalen	0.4
85B-IND-Electio			jewell				
VID07		[C] Conference w/		06/05/2014	05:41 - 06:11	[11064] Marinda van Dalen	0.5
85B-IND-Electio			kg re client mtgs				
VID07		[EM] Email, Draft / Send		06/05/2014	07:44 - 08:02	[11064] Marinda van Dalen	0.3
85B-IND-Electio			RD re dps depo				
VID07		[DP] Document - prepare		06/06/2014	22:07 - 23:07	[11064] Marinda van Dalen	1.0
85B-IND-Electio			responsesRFA				
VID07		[C] Conference w/		06/06/2014	23:08 - 00:20	[11064] Marinda van Dalen	1.2
85B-IND-Electio			pls counsel re response RFA				
VID07		[R] Research, Legal		06/06/2014	00:21 - 01:39	[11064] Marinda van Dalen	1.3
85B-IND-Electio			voting of non-citizens; language of SB14 for RFA responses.				
VID07		[DOC] Document - receive/review		06/06/2014	01:40 - 02:10	[11064] Marinda van Dalen	0.5
85B-IND-Electio			lara and espinosa depositions				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send pls counsel re bickerstaff counsel	06/08/2014	13:22 - 13:44	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send support staff client meetings. logistics	06/08/2014	13:45 - 14:03	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare oul for mendez depo prep	06/08/2014	14:04 - 15:04	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send e simpson re discov, doc prod'n	06/08/2014	15:05 - 15:23	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review document review - docs from clients.	06/08/2014	15:24 - 16:54	[11064] Marinda van Dalen		1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review ortiz pls depo transcripts	06/09/2014	14:21 - 16:51	[11064] Marinda van Dalen		2.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send TX re depo dates, docs,	06/09/2014	16:52 - 17:16	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[ASMT] Assignment KG contact clients with fact questions	06/09/2014	17:17 - 17:29	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review corresp re discov disputes	06/09/2014	17:30 - 17:48	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare LUPE depo objections, draft	06/09/2014	17:49 - 18:49	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DP] Document - prepare Responses to TEX RFA	06/09/2014	18:50 - 19:50	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DP] Document - prepare review estrada decl and docs for Jewell	06/09/2014	19:51 - 20:51	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send schedule call with Juanita/LUPE	06/09/2014	20:52 - 21:10	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review pls experts chart	06/10/2014	13:23 - 13:41	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review tlyv depo obj	06/10/2014	13:42 - 14:00	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 324, m to compel	06/10/2014	14:01 - 14:19	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare docs to K Jewell	06/10/2014	14:20 - 19:50	[11064] Marinda van Dalen		5.5
VID07 85B-IND-Electio	[DP] Document - prepare objections to LUPE notice.	06/10/2014	19:51 - 21:21	[11064] Marinda van Dalen		1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review naacp depo transcript	06/11/2014	13:25 - 14:43	[11064] Marinda van Dalen	NC	1.3



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Telephone call to...	Date	Time	Status	Staff	NC	Hours
85B-IND-Electio		e simpson re depos	06/11/2014	14:14 - 15:02	[11064]	Marinda van Dalen	NC	0.8
VID07 85B-IND-Electio	[DP]	Document - prepare LUPE docs to produce to TX	06/11/2014	15:03 - 16:15	[11064]	Marinda van Dalen		1.2
VID07 85B-IND-Electio	[EM]	Email, Draft / Send docs to Jewell... many	06/11/2014	16:16 - 16:58	[11064]	Marinda van Dalen		0.7
VID07 85B-IND-Electio	[DP]	Document - prepare depo transcripts to Jewell	06/11/2014	16:59 - 17:59	[11064]	Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DP]	Document - prepare production to TX	06/11/2014	17:60 - 19:06	[11064]	Marinda van Dalen		1.1
VID07 85B-IND-Electio	[EM]	Email, Draft / Send wolf re depo schedule	06/11/2014	19:07 - 19:19	[11064]	Marinda van Dalen		0.2
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) coordinate espinos meeting	06/11/2014	19:20 - 19:32	[11064]	Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[DP]	Document - prepare oul for LUPE depo	06/11/2014	19:33 - 21:33	[11064]	Marinda van Dalen		2.0
VID07 85B-IND-Electio	[HG]	Hearing Hearing on [SUBJECT]	06/18/2014	18:12 - 19:24	[11064]	Marinda van Dalen		1.2
VID07 85B-IND-Electio	[T]	Telephone call to... lindsey re depos, outstanding discovery issues.	06/18/2014	19:25 - 19:43	[11064]	Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send lindsey additional docs on individual pls; prepare docs for production.	06/18/2014	19:44 - 20:56	[11064]	Marinda van Dalen		1.2
VID07 85B-IND-Electio	[C]	Conference w/ RWD re tdl	06/18/2014	20:57 - 21:21	[11064]	Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[DP]	Document - prepare tdl update	06/18/2014	21:22 - 21:46	[11064]	Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[DOC]	Document - receive/review NAACP depo transcripts	06/18/2014	23:49 - 02:13	[11064]	Marinda van Dalen	NC	2.4
VID07 85B-IND-Electio	[DOC]	Document - receive/review depo notice lydia lara	06/18/2014	02:14 - 02:44	[11064]	Marinda van Dalen		0.5
VID07 85B-IND-Electio	[EM]	Email, Draft / Send Chad re provisional ballots /mult	06/19/2014	14:05 - 14:17	[11064]	Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM]	Email, Draft / Send Texas re discovery issues	06/19/2014	14:18 - 14:30	[11064]	Marinda van Dalen		0.2
VID07 85B-IND-Electio	[T]	Telephone call to... pls' call	06/19/2014	14:50 - 16:50	[11064]	Marinda van Dalen	NC	2.0
VID07 85B-IND-Electio	[TV]	Travel willacy cty to see mendez and maximina	06/19/2014	16:51 - 19:09	[11064]	Marinda van Dalen		2.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

FILED/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[C] Conference w/ mendez; maximina	06/18/2014	19:10 - 21:40	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[T] Telephone call to... pls counsel; then pls counsel with DOJ	06/19/2014	21:41 - 23:23	[11064] Marinda van Dalen	NC 1.7
VID07 85B-IND-Electio	[T] Telephone call to... jewell re rpt.	06/19/2014	23:24 - 24:00	[11064] Marinda van Dalen	0.6
VID07 85B-IND-Electio	[TV] Travel sebastian, raymondville	06/20/2014	14:07 - 16:37	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[DEP] Deposition - Take mendez deposedDeposed [NAME]	06/20/2014	16:38 - 20:38	[11064] Marinda van Dalen	4.0
VID07 85B-IND-Electio	[DOC] Document - receive/review other pls' suppl disclosures	06/20/2014	20:39 - 20:57	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[DP] Document - prepare reponses to RFA's	06/20/2014	20:58 - 21:28	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare oul lupe depo prep	06/22/2014	14:10 - 16:10	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review lupe docs again, cmlpt, standing law	06/22/2014	16:11 - 18:11	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[T] Telephone call to... lydia lara to see if she wants to remain in suit. she had just returned from hospital and wasn't feeling well enough to talk. i'll try her again soon.	06/23/2014	15:21 - 15:39	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... lydia lara about dropping out.	06/23/2014	17:07 - 17:19	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... taylor re dopo.	06/23/2014	17:20 - 17:32	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[C] Conference w/ KG re lydia lara, taylor depo issues.	06/23/2014	17:33 - 17:57	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DP] Document - prepare ortiz declaration; email to Sita with directions for mtg, etc. list docs an dquestions.	06/23/2014	17:58 - 19:16	[11064] Marinda van Dalen	NC 1.3
VID07 85B-IND-Electio	[DP] Document - prepare estela espinosa decl. research waht need for EIC. t- jewell re espinosa, id issues.	06/23/2014	19:17 - 21:17	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[DEP] Deposition - Take prepare for depo Maximina Lara. Cancelled when TX lawyer's flight 3 hours delayed. Deposed [NAME]	06/23/2014	21:18 - 22:00	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[TV] Travel SJ to meet with Juanita Cox	06/24/2014	14:33 - 17:03	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[C] Conference w/ Juanita Cox, depo prep	06/24/2014	17:04 - 18:22	[11064] Marinda van Dalen	1.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Description	Date	Time	Staff	Hours
85B-IND-Electio	[DP] Document - prepare oul for mtg with J Cox	06/24/2014	18:23 - 18:53	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) logistics for Taylor depo	06/24/2014	18:54 - 19:18	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[ASMT] Assignment KG re declarations for Jewell	06/24/2014	19:19 - 19:37	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[C] Conference w/ pls counsel call	06/24/2014	19:38 - 20:08	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[ASMT] Assignment KG re lydia lara dropping, call	06/24/2014	20:09 - 20:21	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[T] Telephone call to... RWD re depo prep, discovery issues	06/24/2014	20:22 - 21:22	[11064] Marinda van Dalen	NC 1.0
VID07 85B-IND-Electio	[DP] Document - prepare estrada declaration	06/24/2014	21:23 - 21:41	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review estrada dps docs; docs to KJ	06/24/2014	21:42 - 22:06	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review expert report on provisional voters	06/24/2014	22:07 - 22:31	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send cox on depo schedule	06/24/2014	22:32 - 22:44	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re taylor depo	06/24/2014	22:45 - 22:57	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send sita re ortiz	06/24/2014	22:58 - 23:16	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send whitley re depo start time	06/24/2014	23:17 - 23:29	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DEP] Deposition - Take Juanita Cox, LUPEDeposed [NAME]	06/25/2014	15:08 - 19:38	[11064] Marinda van Dalen	4.5
VID07 85B-IND-Electio	[TV] Travel San Juan for depo	06/25/2014	19:39 - 22:09	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[C] Conference w/ cox, depo prep	06/25/2014	22:10 - 22:34	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) logistics of taylor depo	06/25/2014	22:35 - 22:53	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[DP] Document - prepare espinosa desl	06/25/2014	23:26 - 23:44	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re taylor depo logistics	06/25/2014	00:10 - 00:22	[11064] Marinda van Dalen	NC 0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Event</b>	<b>Date</b>	<b>Time</b>	<b>Status</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send K Jewell dlc and docs, expinosa	06/26/2014	15:22 - 15:51	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send Mendez depo to Jewell	06/26/2014	15:52 - 16:04	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send Response to RFA to all counsel	06/26/2014	16:05 - 16:17	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) taylor depo logistics	06/26/2014	16:18 - 16:30	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... RWD re estrada depo	06/26/2014	16:31 - 16:49	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[DP] Document - prepare Responses to RFA, final edits, etc.	06/26/2014	18:21 - 19:21	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re taylor depo	06/27/2014	15:33 - 15:45	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... Jewell re report	06/27/2014	16:06 - 17:18	[11064] Marinda van Dalen	1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 380	07/08/2014	10:02 - 10:08	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[C] Conference w/ pls counsel; DOJ re FOF, evidentiary issues, compelling discovery.	07/08/2014	10:09 - 12:09	[11064] Marinda van Dalen NC	2.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) arrange expert payment	07/09/2014	10:21 - 10:39	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re lydia depo, remianing pls depositions, multiple	07/09/2014	10:40 - 11:04	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review crevella west re client docs	07/09/2014	11:05 - 11:35	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[ASMT] Assignment KG review CW for docs on pls	07/09/2014	11:36 - 11:54	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) schedule Maximina depo	07/09/2014	11:55 - 12:13	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send review emails from pls counsel	07/09/2014	12:14 - 12:38	[11064] Marinda van Dalen NC	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review review recent filings	07/09/2014	12:39 - 13:39	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[ASMT] Assignment KG, delayed BC's for clients.	07/11/2014	12:46 - 13:04	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send RWD, Chad Dunn re response motion to compel	07/11/2014	13:05 - 13:23	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Description</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[DOC]	Document - receive/review taylor docs, decl in prep for depo.	07/14/2014	13:22 - 14:03	[11064] Marinda van Dalen	0.8
VID07 85B-IND-Electio	[T]	Telephone call to... taylor re depo	07/15/2014	14:50 - 15:08	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM]	Email, Draft / Send co-counsel re state extension request	07/15/2014	15:09 - 15:21	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T]	Telephone call to... DOJ, pls. counsel re texas request for extension	07/15/2014	15:22 - 15:40	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC]	Document - receive/review review pls' expert reports	07/15/2014	15:41 - 20:41	[11064] Marinda van Dalen	NC 5.0
VID07 85B-IND-Electio	[C]	Conference w/ pls counsel	07/16/2014	14:53 - 15:53	[11064] Marinda van Dalen	NC 1.0
VID07 85B-IND-Electio	[DOC]	Document - receive/review estrada deposition.	07/16/2014	15:54 - 16:54	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[CM]	Case Management (org. file, etc.) logistics taylor depo	07/16/2014	16:55 - 17:13	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[DP]	Document - prepare review for RWD response to motion to compel	07/16/2014	17:27 - 17:45	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[TV]	Travel brownsville to alice	07/17/2014	15:06 - 17:36	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[TV]	Travel alice to CC	07/17/2014	17:56 - 18:56	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C]	Conference w/ taylor depo prep	07/17/2014	18:57 - 21:27	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[DOC]	Document - receive/review review Taylor docs; locate in production	07/17/2014	21:28 - 22:28	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T]	Telephone call to... whitley re depo location and time	07/17/2014	22:29 - 22:47	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DEP]	Deposition - Take L. Taylor. Deposed	07/18/2014	12:25 - 13:25	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C]	Conference w/ I taylor prior to dep.	07/18/2014	13:26 - 13:56	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C]	Conference w/ I taylor after depo	07/18/2014	13:57 - 14:27	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[TV]	Travel CC to BRO	07/18/2014	14:28 - 17:28	[11064] Marinda van Dalen	3.0
VID07 85B-IND-Electio	[T]	Telephone call to... RWD re Taylor depo	07/18/2014	17:29 - 17:41	[11064] Marinda van Dalen	NC 0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

FILED/Type	Code	Telephone call to...	Date	Time	Staff	NC	Hours
85B-IND-Electio		DOJ re Taylor dep.	07/18/2014	12:12 - 18:00	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	re pending motions for hearing, with ct and CC.	07/21/2014	14:29 - 14:41	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare	edit RWD's response to m to compel	07/21/2014	14:42 - 15:00	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review	DOJ oul on FOF, email CC re same	07/21/2014	15:01 - 15:19	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[ASMT] Assignment	KG confirm Max dep	07/21/2014	15:20 - 15:32	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send	Juanita Cox re reviewing depo	07/21/2014	15:33 - 15:45	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare	motion to dismiss lydia	07/21/2014	15:59 - 16:17	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review	read Juanits Cox depo	07/21/2014	16:18 - 18:18	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[TV] Travel	Raymondville, depo Maximina	07/22/2014	14:32 - 16:32	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DEP] Deposition - Take	Maximina Lara,	07/22/2014	16:33 - 18:33	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[C] Conference w/	maximina, depo prep	07/22/2014	18:34 - 19:04	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	expert payment	07/22/2014	19:05 - 19:17	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[C] Conference w/	private pls counsel. how to deal with missing data issue, experts	07/23/2014	12:22 - 12:52	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[T] Telephone call to...	RWD re FOF, TTVote motion; data. Trial witnesses.	07/25/2014	12:03 - 12:27	[11064] Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[T] Telephone call to...	jose garza re pls mtg dc, trial strategy re witnesses, his schedule.	07/25/2014	12:28 - 12:58	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send	Ezra re pls mtg dc	07/25/2014	12:59 - 13:11	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	expert payment	07/25/2014	13:12 - 13:24	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[DEP] Deposition - Take	listen in on Dewhurst depo. Deposed [NAME]	07/29/2014	12:21 - 14:21	[11064] Marinda van Dalen	NC	2.0
VID07 85B-IND-Electio	[TV] Travel	make travel plans for all pls counsel meeting.	07/29/2014	14:22 - 15:22	[11064] Marinda van Dalen	NC	1.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>FILE</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send pls' counsel re depositions	07/28/2014	11:23 - 15:35	[11064] Marinda van Dalen	NC	4.1
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings, emails re data issues (TX error).	07/29/2014	15:36 - 16:18	[11064] Marinda van Dalen	NC	0.7
VID07 85B-IND-Electio	[T] Telephone call to... FOF, expert reply, hg next week.	07/30/2014	12:04 - 12:22	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DEP] Deposition - Take Crawford depo, present . Deposed	07/30/2014	12:23 - 14:23	[11064] Marinda van Dalen	NC	2.0
VID07 85B-IND-Electio	[C] Conference w/ pls counsel re deadlines	07/30/2014	14:24 - 14:42	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send RWD re covering next hg.	07/30/2014	15:02 - 15:14	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls' counsel re scheduling issues	07/30/2014	15:15 - 15:27	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[T] Telephone call to... RWD re tdl	07/31/2014	16:37 - 16:55	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review Maximina Lara depo transcript	07/31/2014	16:56 - 17:38	[11064] Marinda van Dalen		0.7
VID07 85B-IND-Electio	[T] Telephone call to... ezra re agenda for tuesday pls counsel mtg.	08/01/2014	09:18 - 09:30	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[T] Telephone call to... emma simpson re affected persons, tues mtg	08/01/2014	09:31 - 09:49	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review re-read Jewell report.	08/01/2014	09:50 - 10:50	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re mtg on affected person, preparation of summary.	08/01/2014	10:51 - 11:03	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) travel plans - hotel, shuttle, etc.	08/01/2014	11:04 - 12:04	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[DP] Document - prepare summary of Ortiz pls (individual) for all pls' counsel mtg.	08/03/2014	15:46 - 18:46	[11064] Marinda van Dalen		3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review Reread all Ortiz individual pls depositions for preparation of summary.	08/03/2014	18:47 - 21:47	[11064] Marinda van Dalen		3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review Read data experts' reports.	08/03/2014	21:48 - 00:18	[11064] Marinda van Dalen	NC	2.5
VID07 85B-IND-Electio	[TV] Travel DC for all pl counsel mtg.	08/04/2014	15:54 - 00:54	[11064] Marinda van Dalen	NC	9.0
VID07 85B-IND-Electio	[DOC] Document - receive/review TX prod of docs	08/04/2014	00:55 - 01:37	[11064] Marinda van Dalen		0.7



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Description</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[DOC] Document - receive/review mtg agenda	08/04/2014	01:28 - 01:50	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re jewell depo and dismissal or ortiz and lydia lara	08/04/2014	01:51 - 02:09	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review pls expert reports	08/04/2014	02:10 - 06:10	[11064] Marinda van Dalen	NC	4.0
VID07 85B-IND-Electio	[C] Conference w/ all pls counsel	08/05/2014	16:37 - 21:07	[11064] Marinda van Dalen	NC	4.5
VID07 85B-IND-Electio	[T] Telephone call to... Jose graza re tdl, ortiz pls at trial, evidentiary issues	08/05/2014	21:08 - 22:08	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send multiple with pl counsel re experts	08/05/2014	23:10 - 23:28	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re LUPE stip	08/05/2014	23:29 - 23:47	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review review recent filings, incl dkt 453	08/05/2014	23:48 - 00:36	[11064] Marinda van Dalen	NC	0.8
VID07 85B-IND-Electio	[T] Telephone call to... RWD re Ortiz trial witnesses	08/06/2014	16:43 - 17:01	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[T] Telephone call to... RWD re LUPE stip	08/06/2014	17:02 - 17:14	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review DKT 454 and other recent filings	08/06/2014	17:15 - 17:45	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send TRLA cc re LUPE stip	08/06/2014	17:46 - 18:04	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re depo designations.	08/06/2014	18:05 - 18:23	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[TV] Travel DC to RGV	08/06/2014	18:24 - 04:24	[11064] Marinda van Dalen	NC	10.0
VID07 85B-IND-Electio	[T] Telephone call to... lindsey wolf re LUPE stip, motion to compel, dismissal of ortiz and lydia lara.	08/07/2014	14:35 - 14:53	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare doc's jewell provided with to produce to other parties. started.	08/07/2014	14:54 - 15:24	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[DP] Document - prepare oul for call with lindsey re LUPE stip, ortiz, l lara, other discovery issues	08/07/2014	15:25 - 15:43	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review LUPE depo re membership effected by SB14	08/07/2014	15:44 - 16:44	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review TX proposed stip LUPE.	08/07/2014	16:45 - 16:57	[11064] Marinda van Dalen		0.2



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	Research, Legal	08/07/2014	16:58 - 17:10	[11064] Marinda van Dalen	
VID07	what need to produce that expert relied upon				
85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	17:11 - 17:29	[11064] Marinda van Dalen	0.3
VID07	multiple pls counsel re depo schedule, organizational pl stips				
85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	17:30 - 17:42	[11064] Marinda van Dalen	0.2
VID07	Doggett re discovery issues, mult				
85B-IND-Electio	[DP] Document - prepare	08/07/2014	17:43 - 20:13	[11064] Marinda van Dalen	2.5
VID07	summary of pls facts for discussion of who to testify at trial.				
85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	20:14 - 20:26	[11064] Marinda van Dalen	0.2
VID07	ezra re depo designations				
85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	20:27 - 20:39	[11064] Marinda van Dalen	0.2
VID07	wolf re lupe stip				
85B-IND-Electio	[DP] Document - prepare	08/07/2014	20:40 - 20:58	[11064] Marinda van Dalen	0.3
VID07	witness list for trial				
85B-IND-Electio	[DP] Document - prepare	08/08/2014	16:50 - 17:20	[11064] Marinda van Dalen	NC 0.5
VID07	travel reimbursement				
85B-IND-Electio	[EM] Email, Draft / Send	08/08/2014	17:21 - 17:33	[11064] Marinda van Dalen	NC 0.2
VID07	pl counsel re section 5 transcript				
85B-IND-Electio	[EM] Email, Draft / Send	08/08/2014	17:34 - 17:52	[11064] Marinda van Dalen	0.3
VID07	simpson re discov issues				
85B-IND-Electio	[EM] Email, Draft / Send	08/08/2014	17:53 - 18:35	[11064] Marinda van Dalen	0.7
VID07	rwd re jewell docs, depo, fof				
85B-IND-Electio	[EM] Email, Draft / Send	08/08/2014	18:36 - 19:00	[11064] Marinda van Dalen	NC 0.4
VID07	multiple among pls counsel re fof, experts				
85B-IND-Electio	[DP] Document - prepare	08/08/2014	19:01 - 19:19	[11064] Marinda van Dalen	0.3
VID07	exhibit list				
85B-IND-Electio	[EM] Email, Draft / Send	08/08/2014	19:20 - 19:38	[11064] Marinda van Dalen	0.3
VID07	all counsel re jewell docs				
85B-IND-Electio	[DP] Document - prepare	08/08/2014	19:39 - 22:09	[11064] Marinda van Dalen	2.5
VID07	collect, stamp, review all docs provided to jewell and prepare for distribution to all counsel				
85B-IND-Electio	[DOC] Document - receive/review	08/08/2014	22:10 - 00:10	[11064] Marinda van Dalen	2.0
VID07	expert reports				
85B-IND-Electio	[DP] Document - prepare	08/10/2014	13:44 - 16:14	[11064] Marinda van Dalen	2.5
VID07	new oul client facts, docs				
85B-IND-Electio	[DP] Document - prepare	08/10/2014	16:15 - 19:45	[11064] Marinda van Dalen	3.5
VID07	FOF, jewell				
85B-IND-Electio	[DP] Document - prepare	08/11/2014	13:46 - 14:04	[11064] Marinda van Dalen	NC 0.3
VID07	dep index, em to yeary				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

Case ID/Type	Event	Date	Time	Staff	NC	Hours
85B-IND-Electio	[EM] Email, Draft / Send pls counsel re FOF/delayed BC facts.	08/11/2014	14:05 - 14:17	[11064] Marinda van Dalen		
VID07 85B-IND-Electio	[DOC] Document - receive/review farinelli depo	08/11/2014	14:37 - 15:37	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re LUPE stip	08/11/2014	15:38 - 15:56	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare FOF, Jewell, individual pls.	08/11/2014	15:57 - 17:09	[11064] Marinda van Dalen		1.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re expert depo dates	08/12/2014	14:05 - 14:23	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re ortiz pls FOF	08/12/2014	14:24 - 14:36	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re stip	08/12/2014	14:37 - 14:49	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send all counsel re add'l ortiz doc production.	08/12/2014	14:50 - 15:08	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DP] Document - prepare ortiz, suppl doc prod'n	08/12/2014	15:09 - 15:39	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[DP] Document - prepare FOF, LUPE, individual pls, Jewell	08/12/2014	15:40 - 19:40	[11064] Marinda van Dalen		4.0
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 467 , 468	08/12/2014	19:41 - 20:17	[11064] Marinda van Dalen		0.6
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 469, m compel	08/13/2014	14:13 - 14:43	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) m compelPrepared for court hearing on [SUBJECT]	08/13/2014	14:44 - 15:44	[11064] Marinda van Dalen	NC	1.0
VID07 85B-IND-Electio	[DP] Document - prepare docs to produce to Jewell	08/13/2014	15:45 - 16:45	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review def proposed stips; email RWD re same	08/13/2014	16:46 - 17:10	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review COL, pls	08/13/2014	17:11 - 19:11	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DP] Document - prepare fof, pls; review depo designations	08/13/2014	19:12 - 20:12	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send Lindsey Wolf re resolution of motion to compel.	08/14/2014	12:00 - 12:24	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send Wolf re resolution of motion to compel (multiple)	08/14/2014	12:25 - 12:43	[11064] Marinda van Dalen		0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

FILED/Type	DISC	Date	Time	Staff	Hours
85B-IND-Electio	Discovery (drafting docs)	08/14/2014	12:44 - 13:44	[11064] Marinda van Dalen	
VID07	prepare additional docs to produce to texas relating to Jewell. batestamp and send.				
85B-IND-Electio	[T] Telephone call to...	08/14/2014	13:45 - 14:03	[11064] Marinda van Dalen	0.3
VID07	RWD re stipulations TExas wants re motion to compel.				
85B-IND-Electio	[HG] Hearing	08/14/2014	14:04 - 15:04	[11064] Marinda van Dalen	1.0
VID07	discovery issues.Hearing on				
85B-IND-Electio	[HG] Hearing	08/14/2014	15:05 - 16:05	[11064] Marinda van Dalen	1.0
VID07	preparation to argue Dkt 427				
85B-IND-Electio	[T] Telephone call to...	08/14/2014	16:06 - 16:24	[11064] Marinda van Dalen	0.3
VID07	Rich at Wilmer re stipulations				
85B-IND-Electio	[C] Conference w/	08/14/2014	16:25 - 17:19	[11064] Marinda van Dalen	NC 0.9
VID07	first cconfer with Texas; then with private pls counsel re motion to compel.				
85B-IND-Electio	[EM] Email, Draft / Send	08/14/2014	17:20 - 17:44	[11064] Marinda van Dalen	NC 0.4
VID07	numerous emails with private counsel re stips				
85B-IND-Electio	[EM] Email, Draft / Send	08/14/2014	17:45 - 18:27	[11064] Marinda van Dalen	0.7
VID07	jewell add'l docs; prep				
85B-IND-Electio	[DP] Document - prepare	08/14/2014	18:28 - 18:46	[11064] Marinda van Dalen	0.3
VID07	stip LUPE				
85B-IND-Electio	[DP] Document - prepare	08/14/2014	18:47 - 19:05	[11064] Marinda van Dalen	0.3
VID07	stip mendez				
85B-IND-Electio	[DOC] Document - receive/review	08/14/2014	19:06 - 20:06	[11064] Marinda van Dalen	1.0
VID07	section 5 trial transc				
85B-IND-Electio	[T] Telephone call to...	08/15/2014	10:09 - 10:27	[11064] Marinda van Dalen	0.3
VID07	lindsey wolf re motion to compel, stips				
85B-IND-Electio	[T] Telephone call to...	08/15/2014	10:28 - 10:58	[11064] Marinda van Dalen	0.5
VID07	RWD re TX motion to compel, stips				
85B-IND-Electio	[C] Conference w/	08/15/2014	10:59 - 12:29	[11064] Marinda van Dalen	1.5
VID07	pls counsel re witn, exh, depo designations, fof, col,				
85B-IND-Electio	[C] Conference w/	08/15/2014	12:30 - 13:30	[11064] Marinda van Dalen	1.0
VID07	pls counsel re affected persons to testify at trial				
85B-IND-Electio	[C] Conference w/	08/15/2014	13:31 - 15:01	[11064] Marinda van Dalen	NC 1.5
VID07	all pls counsel re JPTO				
85B-IND-Electio	[EM] Email, Draft / Send	08/15/2014	15:02 - 15:20	[11064] Marinda van Dalen	0.3
VID07	lindsey (mult) re stipulations				
85B-IND-Electio	[DP] Document - prepare	08/15/2014	15:21 - 17:21	[11064] Marinda van Dalen	NC 2.0
VID07	stipulations for individual pls - proposed for settlement				
85B-IND-Electio	[EM] Email, Draft / Send	08/15/2014	17:41 - 17:59	[11064] Marinda van Dalen	NC 0.3
VID07	yearly re sectin 5 designations				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Description	Date	Time	Staff	Hours
85B-IND-Electio	COL re delayed BC and SB14 ID.	08/16/2014	16:29 - 17:03	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send simpson re delayed BC	08/16/2014	17:04 - 17:16	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel ortiz FOF draft	08/16/2014	17:17 - 17:29	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review draft FOF from DOJ	08/16/2014	17:30 - 18:30	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[DP] Document - prepare depo designations, ortiz pls	08/16/2014	18:31 - 22:01	[11064] Marinda van Dalen	3.5
VID07 85B-IND-Electio	[T] Telephone call to... pls counsel re tdl, FOF, COL, exh list, with list	08/17/2014	10:11 - 11:41	[11064] Marinda van Dalen NC	1.5
VID07 85B-IND-Electio	[T] Telephone call to... myrna, vishal re law enforcement issue, j. cox, provisional ballots	08/17/2014	11:42 - 12:00	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review affected persons chart	08/17/2014	12:01 - 12:31	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra FOF ortiz pls	08/17/2014	12:32 - 12:50	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send myrna perez re provisional ballots, etc.	08/17/2014	12:51 - 13:09	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare provisional ballots to BC/perez	08/17/2014	13:10 - 13:40	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel docs served on texas	08/17/2014	13:41 - 13:59	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra, myrna re FOF	08/17/2014	14:19 - 14:37	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare FOF	08/17/2014	14:38 - 19:38	[11064] Marinda van Dalen	5.0
VID07 85B-IND-Electio	[T] Telephone call to... RWD re importance of Juanita testifying.	08/18/2014	10:21 - 10:39	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[T] Telephone call to... Juanita Cox re testifying	08/18/2014	10:40 - 10:58	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ pls counsel re affected persons facts (part of call)	08/18/2014	10:59 - 11:59	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send cox re trial	08/18/2014	11:60 - 12:12	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send yearly re designations of depositions	08/18/2014	12:13 - 12:31	[11064] Marinda van Dalen	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[EM] Email, Draft / Send	08/18/2014	12:32 - 12:44	[11064] Marinda van Dalen	NC	0.2
	vishal BC re provisional ballots					
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/18/2014	12:45 - 12:57	[11064] Marinda van Dalen		0.2
	wolf re stips / deal with					
VID07 85B-IND-Electio	[T] Telephone call to...	08/18/2014	12:58 - 13:10	[11064] Marinda van Dalen	NC	0.2
	taylor re trial - wait long time, not connected					
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/18/2014	13:11 - 13:23	[11064] Marinda van Dalen		0.2
	peter re taylor at trial					
VID07 85B-IND-Electio	[DP] Document - prepare	08/18/2014	13:24 - 21:24	[11064] Marinda van Dalen		8.0
	FOF, ortiz pls					
VID07 85B-IND-Electio	[T] Telephone call to...	08/19/2014	16:53 - 17:05	[11064] Marinda van Dalen		0.2
	ct re pls without ID					
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/19/2014	17:06 - 17:18	[11064] Marinda van Dalen		0.2
	posner re FOF					
VID07 85B-IND-Electio	[T] Telephone call to...	08/19/2014	17:19 - 17:43	[11064] Marinda van Dalen	NC	0.4
	dgh re trial issues, finances					
VID07 85B-IND-Electio	[DP] Document - prepare	08/19/2014	17:44 - 18:44	[11064] Marinda van Dalen		1.0
	JPTO draft					
VID07 85B-IND-Electio	[T] Telephone call to...	08/19/2014	18:45 - 19:45	[11064] Marinda van Dalen		1.0
	margo, maximina, delma re trial					
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters	08/19/2014	20:05 - 20:35	[11064] Marinda van Dalen	NC	0.5
	hotel resrv, etc.					
VID07 85B-IND-Electio	[T] Telephone call to...	08/19/2014	20:36 - 20:54	[11064] Marinda van Dalen		0.3
	mendez re trial					
VID07 85B-IND-Electio	[DP] Document - prepare	08/19/2014	20:55 - 00:55	[11064] Marinda van Dalen		4.0
	FOF					
VID07 85B-IND-Electio	[DP] Document - prepare	08/20/2014	17:04 - 17:22	[11064] Marinda van Dalen		0.3
	new edits to jpto					
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/20/2014	17:23 - 17:35	[11064] Marinda van Dalen		0.2
	ezra re witn dates					
VID07 85B-IND-Electio	[T] Telephone call to...	08/20/2014	17:36 - 18:36	[11064] Marinda van Dalen		1.0
	clients re trial dates					
VID07 85B-IND-Electio	[DP] Document - prepare	08/20/2014	18:37 - 18:55	[11064] Marinda van Dalen	NC	0.3
	estrada stip/ em RWD					
VID07 85B-IND-Electio	[DP] Document - prepare	08/20/2014	19:57 - 01:27	[11064] Marinda van Dalen		5.5
	FOF and depo designations					
VID07 85B-IND-Electio	[DP] Document - prepare	08/20/2014	01:28 - 03:28	[11064] Marinda van Dalen		2.0
	depo designations, more.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	Conference w/ pls counsel re FOF/COL, JPTO, witnesses.	08/21/2014	10:06 - 10:36	[11064] Marinda van Dalen	NC	
<b>VID07</b> 85B-IND-Electio	<b>[HG]</b> Hearing re US/TX discovery dispute, FPTC. Hearing on discovery	08/21/2014	10:37 - 10:55	[11064] Marinda van Dalen	NC	0.3
<b>VID07</b> 85B-IND-Electio	<b>[T]</b> Telephone call to... Lenard Taylor re trial.	08/21/2014	10:56 - 11:14	[11064] Marinda van Dalen		0.3
<b>VID07</b> 85B-IND-Electio	<b>[T]</b> Telephone call to... estela espinoza re trial	08/21/2014	11:15 - 11:33	[11064] Marinda van Dalen		0.3
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b> Email, Draft / Send RWD re client trial sched.	08/21/2014	11:34 - 11:40	[11064] Marinda van Dalen	NC	0.1
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b> Email, Draft / Send posner re voter confidence	08/21/2014	11:41 - 11:53	[11064] Marinda van Dalen	NC	0.2
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare witness list	08/21/2014	11:54 - 12:24	[11064] Marinda van Dalen		0.5
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b> Email, Draft / Send westfall re stds OFO/COL	08/21/2014	12:25 - 12:43	[11064] Marinda van Dalen	NC	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare exhibit list	08/21/2014	12:44 - 13:14	[11064] Marinda van Dalen		0.5
<b>VID07</b> 85B-IND-Electio	<b>[EM]</b> Email, Draft / Send yeary re exhibits	08/21/2014	13:15 - 13:33	[11064] Marinda van Dalen		0.3
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b> Document - receive/review review SOS records ortiz pls	08/21/2014	13:34 - 14:34	[11064] Marinda van Dalen		1.0
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b> Document - receive/review review LUPE docs for exh list	08/21/2014	14:35 - 15:35	[11064] Marinda van Dalen		1.0
<b>VID07</b> 85B-IND-Electio	<b>[DOC]</b> Document - receive/review estrada docs for exhibit list	08/21/2014	15:36 - 16:36	[11064] Marinda van Dalen		1.0
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare depo designations	08/21/2014	16:37 - 01:37	[11064] Marinda van Dalen		9.0
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare edits JPTO	08/22/2014	17:22 - 17:40	[11064] Marinda van Dalen		0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare exh list	08/22/2014	17:41 - 17:59	[11064] Marinda van Dalen		0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare designations cover	08/22/2014	17:60 - 18:18	[11064] Marinda van Dalen	NC	0.3
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare JPTO	08/22/2014	18:19 - 18:49	[11064] Marinda van Dalen	NC	0.5
<b>VID07</b> 85B-IND-Electio	<b>[DP]</b> Document - prepare FOF and depo designations	08/22/2014	18:50 - 02:50	[11064] Marinda van Dalen		8.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	NC	Hours
85B-IND-Electio	Conference w/ all pls counsel call re tdl, trial	08/22/2014	10:19 - 11:43	[11064] Marinda van Dalen	NC	1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 490-504. dkt 504: def FOF/COL	08/24/2014	10:20 - 13:50	[11064] Marinda van Dalen		3.5
VID07 85B-IND-Electio	[DOC] Document - receive/review pls FOF/COL final	08/24/2014	13:51 - 15:21	[11064] Marinda van Dalen		1.5
VID07 85B-IND-Electio	[T] Telephone call to... call clients re trial logistics, tdl	08/25/2014	10:22 - 11:22	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review def JPTO, exh and with list	08/25/2014	11:23 - 11:47	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send mcgraw re taylor trial	08/25/2014	11:48 - 12:00	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare depo transcripts with designations for trial	08/25/2014	12:01 - 13:01	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review defendants' depo desingations	08/25/2014	13:02 - 15:02	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re with order	08/25/2014	15:03 - 15:15	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send mult with lps counsel re depo designations, counters, etc.	08/25/2014	15:16 - 15:40	[11064] Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send ct re motions	08/26/2014	10:25 - 10:37	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re obj to depo design	08/26/2014	11:15 - 11:39	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[DP] Document - prepare objs to defs' exh's	08/26/2014	11:40 - 13:40	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[T] Telephone call to... wolf re dkt 343, 469	08/26/2014	13:41 - 14:05	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send mult with pls counsel	08/26/2014	14:25 - 14:49	[11064] Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) FPTC	08/26/2014	14:50 - 17:50	[11064] Marinda van Dalen		3.0
VID07 85B-IND-Electio	[TV] Travel rockport (free lodging) for FPTC	08/26/2014	17:51 - 21:51	[11064] Marinda van Dalen		4.0
VID07 85B-IND-Electio	[HG] Hearing FPTC; tv r'port, wait, talk to CC afterward.	08/27/2014	10:29 - 14:29	[11064] Marinda van Dalen		4.0
VID07 85B-IND-Electio	[TV] Travel CC to BRO via raymondville and sebastian	08/27/2014	14:30 - 18:00	[11064] Marinda van Dalen		3.5



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[C] Conference w/ clients: espinoza, mendez, laras.	08/27/2014	18:01 - 19:31	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters hotel reservation, etc.	08/28/2014	10:55 - 11:07	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[T] Telephone call to... taylor re trial	08/28/2014	11:08 - 11:20	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) arrange translator	08/28/2014	11:21 - 11:51	[11064] Marinda van Dalen	NC 0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send mult with pl counsel re trial witn, depo design	08/28/2014	11:52 - 12:10	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send ct re theories	08/28/2014	12:24 - 12:36	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send Jewell trial date	08/28/2014	12:50 - 13:02	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send RWD re trial sched	08/28/2014	13:03 - 13:15	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[DP] Document - prepare objs, review defs' exh list	08/28/2014	13:16 - 15:16	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ doj, pls counsel	08/28/2014	15:17 - 16:17	[11064] Marinda van Dalen	NC 1.0
VID07 85B-IND-Electio	[DP] Document - prepare depo highlights, designations	08/28/2014	16:18 - 18:18	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[HG] Hearing on evidentiary issues. Hearing	08/28/2014	18:19 - 19:19	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 521	08/29/2014	10:58 - 11:58	[11064] Marinda van Dalen	NC 1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re ortiz pls testim	08/29/2014	11:59 - 12:11	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare objs to texas exh's	08/29/2014	12:12 - 14:12	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[DP] Document - prepare order of witn for trial	08/29/2014	14:13 - 14:31	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls cc re closing	08/30/2014	13:43 - 13:55	[11064] Marinda van Dalen	NC 0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls c re depo desig's	08/30/2014	13:56 - 14:14	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review review texas obj's to pls' exhibits; identify problems.	08/30/2014	14:15 - 16:33	[11064] Marinda van Dalen	2.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Description	Date	Time	Staff	Hours
85B-IND-Electio	[DP] Document - prepare opening	08/30/2014	16:34 - 19:04	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[T] Telephone call to... RWD re tdl, texas exh objections	08/31/2014	13:45 - 14:03	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re concerns for mtg with texas	08/31/2014	14:04 - 14:22	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send jose re opening, attach stuff he might want.	08/31/2014	14:23 - 14:41	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare directs of ortiz pls.	08/31/2014	14:42 - 17:42	[11064] Marinda van Dalen	3.0
VID07 85B-IND-Electio	[TV] Travel CC via willacy county clients	09/01/2014	13:47 - 17:17	[11064] Marinda van Dalen	3.5
VID07 85B-IND-Electio	[C] Conference w/ espinoze and mendez; trial logistics and testimony prep	09/01/2014	17:18 - 19:18	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review motion to compel taylor	09/01/2014	19:19 - 19:49	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review taylor depo transcr.	09/01/2014	19:50 - 20:14	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T] Telephone call to... whitley re taylor depo	09/01/2014	20:34 - 20:52	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[C] Conference w/ all pls counsel re trial issues	09/01/2014	21:06 - 22:06	[11064] Marinda van Dalen NC	1.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re stips	09/01/2014	22:07 - 22:19	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re espinoza	09/01/2014	22:20 - 22:32	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... wolf re depo designations, exhibits	09/01/2014	22:46 - 22:58	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) prepare files to take to corpus; pring exhibits and directs and depos. prepare final trial NB.	09/01/2014	23:18 - 03:48	[11064] Marinda van Dalen	4.5
VID07 85B-IND-Electio	[TL] Trial	09/02/2014	13:54 - 22:54	[11064] Marinda van Dalen	9.0
VID07 85B-IND-Electio	[TV] Travel cc to raymondville	09/02/2014	22:55 - 00:55	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re stips	09/02/2014	01:22 - 01:34	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare direct and exhibits for mendez	09/02/2014	01:35 - 03:35	[11064] Marinda van Dalen	2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	Document - prepare	09/02/2014	07:06	[11064] Marinda van Dalen	3.5
VID07	espinoza trial depo testimony to read / high lights to depo. email wolf.				
85B-IND-Electio	[TV] Travel	09/03/2014	13:58 - 15:58	[11064] Marinda van Dalen	2.0
VID07	sebastian to cc with mendez				
85B-IND-Electio	[C] Conference w/	09/03/2014	15:59 - 17:59	[11064] Marinda van Dalen	2.0
VID07	prep mendez for direct				
85B-IND-Electio	[TL] Trial	09/03/2014	17:60 - 02:00	[11064] Marinda van Dalen	8.0
VID07					
85B-IND-Electio	[TV] Travel	09/04/2014	00:18 - 02:48	[11064] Marinda van Dalen	2.5
VID07	return Taylor to Alice				
85B-IND-Electio	[C] Conference w/	09/05/2014	14:20 - 15:20	[11064] Marinda van Dalen	1.0
VID07	final prep laras				
85B-IND-Electio	[TL] Trial	09/05/2014	15:21 - 18:21	[11064] Marinda van Dalen	3.0
VID07	3.0				
85B-IND-Electio	[TV] Travel	09/05/2014	18:22 - 22:52	[11064] Marinda van Dalen	4.5
VID07	CC to rockport to brownsville				
85B-IND-Electio	[CM] Case Management (org. file, etc.)	09/05/2014	23:24 - 00:24	[11064] Marinda van Dalen	1.0
VID07	pack up from trial				
85B-IND-Electio	[DP] Document - prepare	09/07/2014	09:45 - 16:45	[11064] Marinda van Dalen	7.0
VID07	Jewell demonstrative, direct.				
85B-IND-Electio	[C] Conference w/	09/07/2014	16:46 - 19:16	[11064] Marinda van Dalen	2.5
VID07	Jewell prep testimony				
85B-IND-Electio	[TL] Trial	09/08/2014	09:46 - 18:46	[11064] Marinda van Dalen	9.0
VID07					
85B-IND-Electio	[TP] Trial, prep	09/08/2014	18:47 - 23:17	[11064] Marinda van Dalen	4.5
VID07	cross of rdgz				
85B-IND-Electio	[TL] Trial	09/09/2014	09:50 - 18:50	[11064] Marinda van Dalen	9.0
VID07					
85B-IND-Electio	[TL] Trial	09/10/2014	09:51 - 18:51	[11064] Marinda van Dalen	9.0
VID07					
85B-IND-Electio	[TL] Trial	09/11/2014	09:51 - 14:51	[11064] Marinda van Dalen	5.0
VID07	TL				
85B-IND-Electio	[TV] Travel	09/11/2014	14:52 - 19:22	[11064] Marinda van Dalen	3.4
VID07	cc, brownsville				
85B-IND-Electio	[DOC] Document - receive/review	09/15/2014	11:34 - 12:04	[11064] Marinda van Dalen	0.5
VID07	voting records of pls				
85B-IND-Electio	[DP] Document - prepare	09/15/2014	12:05 - 19:05	[11064] Marinda van Dalen	7.0
VID07	FOF - add trial cites, replace depo cites, add missing cites.				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Code	Date	Time	Staff	Hours
85B-IND-Electio	[EM] Email, Draft / Send wolf re depo designations	09/16/2014	11:35 - 11:47	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re taylor stip	09/16/2014	12:07 - 12:19	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare add trial transcript cites to FOF; revise FOF on Ortiz pls.	09/16/2014	12:20 - 20:20	[11064] Marinda van Dalen	6.0
VID07 85B-IND-Electio	[DOC] Document - receive/review dps docs on ortiz pls	09/17/2014	11:36 - 12:06	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re taylor 2 depo designations	09/17/2014	12:07 - 12:19	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to... RWD re tdl on FOF	09/17/2014	12:20 - 12:32	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[DP] Document - prepare review TX exh list and depo designations to check whether reference to clients appropriate/accurate.	09/17/2014	12:33 - 16:03	[11064] Marinda van Dalen	3.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send wolf re designations depo	09/18/2014	11:38 - 11:50	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review new texas exhs	09/18/2014	11:51 - 12:21	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... jose re closing.	09/18/2014	12:53 - 13:23	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare closing	09/18/2014	13:24 - 15:48	[11064] Marinda van Dalen	2.4
VID07 85B-IND-Electio	[DOC] Document - receive/review COL	09/18/2014	15:49 - 18:49	[11064] Marinda van Dalen	3.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send yearly re designations	09/19/2014	09:27 - 09:39	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DP] Document - prepare closing	09/19/2014	09:40 - 14:10	[11064] Marinda van Dalen	4.5
VID07 85B-IND-Electio	[TV] Travel BRO to CC for trial	09/21/2014	10:19 - 14:19	[11064] Marinda van Dalen	3.4
VID07 85B-IND-Electio	[DP] Document - prepare closing argument	09/21/2014	14:20 - 18:20	[11064] Marinda van Dalen	4.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re closing	09/21/2014	18:21 - 18:33	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review def exh 2756 (new)	09/21/2014	18:34 - 18:46	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[TV] Travel CC to BRO via Mendez visit in Sebastian	09/22/2014	10:31 - 14:31	[11064] Marinda van Dalen	3.8

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	[C] Conference w/ mendez re collateral issues	09/22/2014	14:22 - 15:02	[11064] Marinda van Dalen	0.8
VID07 85B-IND-Electio	[TL] Trial closings	09/22/2014	15:03 - 19:03	[11064] Marinda van Dalen	4.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re FOF revisions	09/22/2014	19:04 - 19:16	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[R] Research, Legal mootnxx	09/23/2014	10:35 - 13:35	[11064] Marinda van Dalen	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review Def corresp to court	09/23/2014	14:37 - 14:55	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... jose re trial, mootness, tdl	09/23/2014	14:56 - 15:26	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review trial transcripts	09/29/2014	16:09 - 17:39	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review trial transcripts	09/30/2014	14:41 - 18:11	[11064] Marinda van Dalen	3.5
VID07 85B-IND-Electio	[DOC] Document - receive/review Brennan Center memo on stays	10/01/2014	13:51 - 14:51	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ pls counsel re tdl, prep for response to TX response to ruling	10/01/2014	14:52 - 15:34	[11064] Marinda van Dalen	0.7
VID07 85B-IND-Electio	[T] Telephone call to... anna baldwin re election monitoring	10/02/2014	13:16 - 13:34	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send baldwin re call	10/02/2014	13:35 - 13:41	[11064] Marinda van Dalen	0.1
VID07 85B-IND-Electio	[T] Telephone call to... RWD re election monitoring	10/02/2014	13:42 - 13:54	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send hebert re aff elected officials	10/06/2014	09:32 - 09:44	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pl counsel re stay briefing	10/06/2014	10:34 - 10:52	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review 7th circ dec'n (new)	10/06/2014	10:53 - 11:53	[11064] Marinda van Dalen	NC 1.0
VID07 85B-IND-Electio	[R] Research, Legal posner memo on relief	10/10/2014	09:55 - 10:19	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review draft resp to advisory of TX	10/10/2014	11:16 - 11:34	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to... VID clients re ruling	10/10/2014	11:35 - 12:05	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File #/Type	Description	Date	Time	Staff	NC	Hours
85B-IND-Electio	[DOC] Document - receive/review TX mandamus to 5th circ.	10/11/2014	12:59	[11064] Marinda van Dalen		2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review ramos' decision	10/11/2014	12:60 - 17:00	[11064] Marinda van Dalen		4.0
VID07 85B-IND-Electio	[DP] Document - prepare brief for 5th circ with RWD. talk to cahd, ezra, jose.	10/12/2014	11:01 - 17:31	[11064] Marinda van Dalen	NC	6.5
VID07 85B-IND-Electio	[C] Conference w/ pls counsel re appeallate briefing	10/12/2014	17:32 - 18:02	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send TX to SCOTUS; email pls counsel re same	10/12/2014	18:03 - 18:33	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send Juanita Cox re status of litigation	10/13/2014	11:02 - 11:20	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[T] Telephone call to... chad re appellate briefing on stay	10/13/2014	11:21 - 11:33	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[T] Telephone call to... ezra re appellate briefing	10/13/2014	11:34 - 11:46	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review read other pls briefs to 5th circ.	10/13/2014	11:60 - 15:00	[11064] Marinda van Dalen	NC	3.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send ezra re SCOTUS briefing	10/14/2014	11:23 - 11:35	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re SCOTUS briefing	10/14/2014	13:03 - 13:21	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send SCOTUS re pls filings	10/14/2014	13:22 - 13:34	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare line edit breif to SCOTUS; email Ezra	10/15/2014	11:25 - 12:55	[11064] Marinda van Dalen		1.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send SCOTUS re briefing	10/15/2014	12:56 - 13:08	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review US brief to SCOTUS	10/15/2014	13:09 - 14:09	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review TX resp to SCOTUS	10/16/2014	12:27 - 13:57	[11064] Marinda van Dalen	NC	1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review veasy reply	10/16/2014	13:58 - 14:16	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send pls counsel re reply	10/16/2014	14:17 - 14:35	[11064] Marinda van Dalen	NC	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send juanita re elections	10/20/2014	16:11 - 16:23	[11064] Marinda van Dalen		0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Telephone call to...	Date	Time	Staff	Hours
85B-IND-Electio		natasha re elections	10/20/2014	16:21 - 16:42	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	ct re conference on relief	10/21/2014	15:51 - 16:03	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send	pls counsel re court's email	10/21/2014	16:04 - 16:22	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[T] Telephone call to...	DOJ re elections	10/21/2014	16:36 - 16:48	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[T] Telephone call to...	Brennan Center re voters turned away at polls in Elsa (twice)	10/22/2014	17:38 - 18:02	[11064] Marinda van Dalen	0.4
VID07 85B-IND-Electio	[T] Telephone call to...	dhg, rwd re turned away voters, voters without ID, tdl	10/22/2014	18:03 - 18:27	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[T] Telephone call to...	a bernet re warrants and dps	10/22/2014	18:28 - 18:52	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[C] Conference w/	d roblado re voters turned away hidalgo cty	10/22/2014	18:53 - 19:11	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[R] Research, Legal	absentee voting in texas, acceptance of ballots, etc.	10/23/2014	15:04 - 17:04	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send	ezra re report to ct on relief hearing	10/23/2014	17:05 - 17:17	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[R] Research, Legal	DPS and warrant checks. t- vishal, BC. em. t-abner. t-dgh. r-restriction criminal cases.	10/24/2014	14:46 - 17:16	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send	ct re hg	10/27/2014	13:30 - 13:42	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review	draft order; mult email with pls counsel	10/28/2014	15:11 - 15:41	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review	review docs and prepare fact memo	10/28/2014	15:42 - 21:42	[11064] Marinda van Dalen	6.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send	pls counsel and co-counsel re filing depo designations	11/11/2014	15:56 - 16:14	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	ezra, co-counsel, re 5th circ brief	11/14/2014	16:02 - 16:20	[11064] Marinda van Dalen	NC 0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	mult email trla and CC re appellate briefing	11/17/2014	10:51 - 11:15	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send	CC re schedule, calls	12/04/2014	11:25 - 11:49	[11064] Marinda van Dalen	NC 0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send	DD re sched; review appel briefing	12/05/2014	11:36 - 12:18	[11064] Marinda van Dalen	NC 0.7



**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>VID/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>NC</b>	<b>Hours</b>
85B-IND-Electio	[DOC] Document - receive/review stmt of case draft	12/11/2014	14:19 - 15:13	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 813	12/11/2014	13:31 - 13:43	[11064] Marinda van Dalen	NC	0.2
VID07 85B-IND-Electio	[T] Telephone call to... pls counsel re appeal	12/16/2014	09:37 - 10:07	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review prep for pls counsel call	12/16/2014	10:08 - 10:38	[11064] Marinda van Dalen	NC	0.5
VID07 85B-IND-Electio	[DP] Document - prepare table affected persons; email to CC	01/05/2015	09:56 - 10:26	[11064] Marinda van Dalen		0.5
VID07 85B-IND-Electio	[T] Telephone call to... taylor re status	01/05/2015	10:27 - 10:39	[11064] Marinda van Dalen		0.2
VID07 85B-IND-Electio	[DP] Document - prepare summary of pl facts from record for appeal	01/05/2015	10:40 - 13:40	[11064] Marinda van Dalen		3.0
VID07 85B-IND-Electio	[C] Conference w/ maximina lara, margo lara, eulalio mendez. travel to sebastian r/t.	01/06/2015	08:07 - 14:07	[11064] Marinda van Dalen		6.0
VID07 85B-IND-Electio	[T] Telephone call to... garza re status appeal.	01/06/2015	14:08 - 14:32	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review veasey brief draft	02/24/2015	14:36 - 15:48	[11064] Marinda van Dalen		1.2
VID07 85B-IND-Electio	[C] Conference w/ JG re status of appeal	03/03/2015	15:16 - 15:34	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send re 5th circ appearance	04/07/2015	10:15 - 10:33	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review Read and analyze 5th circuit decision.	08/06/2015	17:40 - 20:10	[11064] Marinda van Dalen		2.5
VID07 85B-IND-Electio	[T] Telephone call to... JG re dec'n. JG, DGH, RWD re decision, tdl.	08/06/2015	20:11 - 21:11	[11064] Marinda van Dalen		1.0
VID07 85B-IND-Electio	[L] Letter, draft/send Lara family re Mr. Lara's death; news of case.	08/06/2015	21:12 - 21:36	[11064] Marinda van Dalen	NC	0.4
VID07 85B-IND-Electio	[L] Letter, draft/send mr mendez re status of case	08/06/2015	21:37 - 21:55	[11064] Marinda van Dalen		0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send trla CC re status; Mr. mendez.	08/07/2015	12:57 - 13:03	[11064] Marinda van Dalen		0.1
VID07 85B-IND-Electio	[T] Telephone call to... cc (trla) re status	08/17/2015	16:32 - 16:56	[11064] Marinda van Dalen		0.4
VID07 85B-IND-Electio	[TV] Travel bro to austin for settlement mtg.; pick up rental car.	08/26/2015	19:01 - 02:31	[11064] Marinda van Dalen	NC	7.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Description	Date	Time	Status	Hours
85B-IND-Electio	[C] Conference w/ CC re setl mtg; prep for same.	08/26/2015	11:22 - 03:32	[11064] Marinda van Dalen NC	4.8
VID07 85B-IND-Electio	[T] Telephone call to... DOJ tr briefing	09/02/2015	19:09 - 19:39	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[C] Conference w/ RWD re status; briefing.	09/17/2015	18:17 - 18:29	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings for previous 10 days while out of office.	09/17/2015	18:30 - 20:00	[11064] Marinda van Dalen NC	1.5
VID07 85B-IND-Electio	[DOC] Document - receive/review dkt 849	10/27/2015	11:45 - 11:57	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send re status after 5th circ opinion	07/25/2016	09:09 - 09:27	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[R] Research, Legal Review recent VID opinions from other circuits	07/26/2016	09:36 - 12:36	[11064] Marinda van Dalen NC	3.0
VID07 85B-IND-Electio	[EM] Email, Draft / Send court re counsel attending hearing.	07/27/2016	11:44 - 11:56	[11064] Marinda van Dalen NC	0.2
VID07 85B-IND-Electio	[DP] Document - prepare consent motion on interim relief; confer with cc	07/29/2016	14:21 - 16:21	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[DP] Document - prepare review reasonable impediments doc and m; em changes to DOJ.	08/01/2016	12:54 - 13:24	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send CC re texas going back on consent order language.	08/01/2016	13:25 - 13:43	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[DP] Document - prepare review DOJdraft motion; consent. on interim remedy.	08/01/2016	13:44 - 14:02	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ all pls call on interim relief	08/01/2016	14:03 - 14:33	[11064] Marinda van Dalen NC	0.5
VID07 85B-IND-Electio	[C] Conference w/ all parties on interim relief.	08/01/2016	14:34 - 15:04	[11064] Marinda van Dalen NC	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send from Ezra re TX change in position.	08/01/2016	16:33 - 16:51	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[C] Conference w/ CC re TX change in position on interim relief.	08/02/2016	13:26 - 14:08	[11064] Marinda van Dalen NC	0.7
VID07 85B-IND-Electio	[T] Telephone call to... TX re change in position on interim relief.	08/02/2016	14:09 - 14:39	[11064] Marinda van Dalen NC	0.5
VID07 85B-IND-Electio	[EM] Email, Draft / Send from texas with new edits to remand motion and proposed order	08/02/2016	14:40 - 15:16	[11064] Marinda van Dalen NC	0.6
VID07 85B-IND-Electio	[T] Telephone call to... pls call on interim relief, defs' new edits.	08/02/2016	15:17 - 15:47	[11064] Marinda van Dalen	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

File ID/Type	Code	Telephone call to...	Date	Time	Status	Hours
85B-IND-Electio		TX, all parties on interim relief.	08/02/2016	15:48 - 16:18	[11064] Marinda van Dalen NC	0.3
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/02/2016	16:19 - 17:01	[11064] Marinda van Dalen	0.7
		TX new language for consent order; confer with CC re same.				
VID07 85B-IND-Electio	[T]	Telephone call to...	08/02/2016	17:02 - 17:32	[11064] Marinda van Dalen NC	0.5
		CC with all parties over consent order.				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/02/2016	17:33 - 17:51	[11064] Marinda van Dalen NC	0.3
		approve Ezra email to TX re new consent order lg.				
VID07 85B-IND-Electio	[C]	Conference w/	08/02/2016	17:52 - 18:22	[11064] Marinda van Dalen NC	0.5
		CC re consent order language				
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/02/2016	18:36 - 18:54	[11064] Marinda van Dalen	0.3
		review texas new language for RI delcp.				
VID07 85B-IND-Electio	[C]	Conference w/	08/02/2016	18:55 - 19:25	[11064] Marinda van Dalen NC	0.5
		all pls call re language in consent order				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/02/2016	19:26 - 19:38	[11064] Marinda van Dalen NC	0.2
		review Ezra's Joint Plan of Agreed Upon Terms.				
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/02/2016	19:39 - 20:03	[11064] Marinda van Dalen	0.4
		review DOJ new draft of joint submisison and decl.				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/03/2016	13:01 - 13:31	[11064] Marinda van Dalen NC	0.5
		Jennifer Clark re education on VID, BC 08				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/03/2016	13:32 - 13:44	[11064] Marinda van Dalen NC	0.2
		sign off on pls email on status to court coordinator				
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/03/2016	16:22 - 16:46	[11064] Marinda van Dalen	0.4
		dkt 879. texas filinf				
VID07 85B-IND-Electio	[T]	Telephone call to...	08/04/2016	13:07 - 13:31	[11064] Marinda van Dalen	0.4
		Juanita re status of VID litigation				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/04/2016	13:32 - 13:50	[11064] Marinda van Dalen	0.3
		LUPE team, TRLA team re status of litigation.				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/04/2016	15:38 - 15:50	[11064] Marinda van Dalen	0.2
		LUPE re litigation status.				
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/05/2016	14:56 - 15:20	[11064] Marinda van Dalen	0.4
		response to state submission, new veriosn.				
VID07 85B-IND-Electio	[EM]	Email, Draft / Send	08/05/2016	15:40 - 15:52	[11064] Marinda van Dalen	0.2
		ct re hearing by phone				
VID07 85B-IND-Electio	[DOC]	Document - receive/review	08/05/2016	15:53 - 16:11	[11064] Marinda van Dalen	0.3
		dkt 882 texas filing				
VID07 85B-IND-Electio	[DP]	Document - prepare	08/08/2016	12:54 - 14:06	[11064] Marinda van Dalen	1.2
		notice of death margarito lara; file				

**ACTIVITY LOGS**  
**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,**  
**PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Event</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	TX re aug elections; CC. multiple	08/08/2016	14:07 - 14:25	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) assist with moot on issue of training and education. Prepared for court hearing on [SUBJECT]	08/09/2016	09:41 - 11:41	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[C] Conference w/ conference with pl counsel re hearing issues; traing and ed; prep.	08/09/2016	11:42 - 12:42	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[DP] Document - prepare ok let to ct re exhs	08/09/2016	12:43 - 12:55	[11064] Marinda van Dalen	0.2
VID07 85B-IND-Electio	[HG] Hearing interim relief. Hearing on [SUBJECT]; final prep.	08/10/2016	09:39 - 11:09	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[C] Conference w/ contact multiple people to try to get lists of media outlets and organizations to reach affected persons. LUPE, mike seifert evn; geoff ripp, ACLU.	08/10/2016	13:23 - 14:23	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[RO] Research, Non-Legal organizations to suggest Texas provide voting info to. calls/emails to aclu, trla folks, AFSCME.	08/10/2016	14:49 - 17:19	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[T] Telephone call to... all parties re interim relief.	08/10/2016	17:20 - 18:02	[11064] Marinda van Dalen NC	0.7
VID07 85B-IND-Electio	[DP] Document - prepare list of community organizations for education outreach; email to cc.	08/11/2016	11:09 - 11:39	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[DP] Document - prepare community groups to suggest to texas	08/11/2016	15:48 - 20:18	[11064] Marinda van Dalen	4.5
VID07 85B-IND-Electio	[DP] Document - prepare press list to suggest to texas for outreach	08/11/2016	20:19 - 21:49	[11064] Marinda van Dalen	1.5
VID07 85B-IND-Electio	[C] Conference w/ all parties re interim remedy	08/11/2016	21:50 - 22:50	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[C] Conference w/ conference calls with all pls, all parties, again all pls, taylor pls counsel in preparation of hearing on interim relief.	08/12/2016	11:29 - 13:59	[11064] Marinda van Dalen	2.5
VID07 85B-IND-Electio	[DOC] Document - receive/review review tex and pls porposals on interim relief / training and ed	08/12/2016	13:60 - 14:30	[11064] Marinda van Dalen	0.5
VID07 85B-IND-Electio	[T] Telephone call to... pls call re status	08/16/2016	14:10 - 15:10	[11064] Marinda van Dalen	1.0
VID07 85B-IND-Electio	[T] Telephone call to... meet and confer with texas	08/17/2016	14:10 - 14:28	[11064] Marinda van Dalen	0.3
VID07 85B-IND-Electio	[C] Conference w/ with L. Taylor and L. Estrada	05/02/2017	00:45 - 02:45	[11064] Marinda van Dalen	2.0
VID07 85B-IND-Electio	[TV] Travel austin to BRO	05/03/2017	16:47 - 23:47	[11064] Marinda van Dalen	7.0

**ACTIVITY LOGS**

**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,  
PIC=MARINDA VAN DALEN**

<b>FILED/Type</b>	<b>Code</b>	<b>Date</b>	<b>Time</b>	<b>Staff</b>	<b>Hours</b>
85B-IND-Electio	EMAIL, Draft / Send	05/09/2017	17:12 - 17:29	[11064] Marinda van Dalen	0.3
	Juanita re mtg re status of case				
<b>VID07</b>	<b>[TV] Travel</b>	<b>05/09/2017</b>	<b>17:30 - 19:30</b>	<b>[11064] Marinda van Dalen</b>	<b>2.0</b>
85B-IND-Electio	raymondville, sebastian				
<b>VID07</b>	<b>[C] Conference w/</b>	<b>05/09/2017</b>	<b>19:31 - 22:01</b>	<b>[11064] Marinda van Dalen</b>	<b>2.5</b>
85B-IND-Electio	Espinoza, Mendez and Lara re status of case				
<b>VID07</b>	<b>[C] Conference w/</b>	<b>05/09/2017</b>	<b>22:02 - 22:32</b>	<b>[11064] Marinda van Dalen</b>	<b>0.5</b>
85B-IND-Electio	Jose re status of case				

**VID07 TOTAL: 1395.1**

**1395.1 – 236.1 NO CHARGE = 1159 HOURS**

**1159 X \$544 = \$630,496.00**

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**ACTIVITY LOGS**

**FOR CASE ID VID07 [Voter Identification] AND DATES 01/31/2013 TO 01/31/2019,  
PIC=MARINDA VAN DALEN**

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File/ID/Type	Code	Date	Time	Staff	Hours
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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**DECLARATION OF ROBERT DOGGETT IN SUPPORT OF REQUEST  
FOR ATTORNEY'S FEES**

**Background and Prevailing Party**

I am co-counsel for the Taylor set of Plaintiffs, in the above-styled matter. My resume is attached hereto as Attachment No. 1. I am presenting this declaration in support of Taylor Plaintiffs Motion for Attorney's Fees and Costs. This was an action seeking redress for violations of Section 2 of the Voting Rights Act, 52 U.S.C.A. § 10301, as amended, 2006. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 52 U.S.C.A. § 10310(e), as amended 2006. Specifically, Plaintiffs and their attorneys, including Robert Doggett, presented pleadings, evidence, including witness testimony and argument to this Court, challenging the 2011 voter photo ID provisions (commonly referred to as S.B. 14) enacted by the State of Texas. Ultimately, the challenged enactment was enjoined and a remedy imposed because of violations of Section 2 of the Voting Rights Act, found by this Court and affirmed by the *en banc* Fifth Circuit. A review of Plaintiffs' pleadings, attachments and argument in this case together with this Court's orders, including orders regarding the interim relief, as well as final judgment, demonstrate Plaintiffs' position as prevailing party in this action.



## **Time**

My time in this case is kept contemporaneously with the work performed and usually recorded on a daily basis. During the course of this litigation and for the time period ending January 31, 2019, I devoted a total of over **300 hours** to assist with the preparation and prosecution of this action, including participating in the trial of this action. Moreover, I was primarily responsible for the preparation of our expert Kevin Jewell. In the exercise of billing judgment, I am discounting or not billing for portions of my time, as noted in the time keeping exhibit attached hereto, to account for any potential duplication of time with my co-counsel and to account for possible development of unrelated or unnecessary legal or factual issues and to account only for prevailing issues. Therefore, I am requesting compensation for a total of **146.8 hours** spent on the case. I have attached the time records that I maintained in this action, as Attachment No. 2.

There was no unnecessary duplication of efforts. My co-counsel on this case and I carefully coordinated our efforts so as to avoid unnecessary duplication. We carefully divided tasks and witness and exhibit development in a similar fashion and any overlap was minimal and necessary to avoid errors. Moreover, we consulted with each other in order to better coordinate the development of the case. We also coordinated with counsel for other Plaintiff groups, again to seek to avoid duplication. The amount of time expended in this case was necessary because it presented several difficult questions of fact and law, as well as unsettled issues. Time spent in the days leading to the filing of this action were also necessary to protect TRLA's clients' interests and to properly prepare for what was expected to be a quick progression to trial. Yet, the bulk of Plaintiff's counsel's time in this cause was in the presentation of this case to this Court. TRLA's clients demonstrated through their testimony, that they were directly impacted by the requirements of SB 14, in way that showed a violation of Section 2.

The time spent on this case represents the minimum hours necessary for an adequate preparation of pleadings, exhibits, and presentation to the court. Because of my coordination with our lead counsel Jose Garza, who has forty-one years of experience in Voting Rights cases, I did not spend any unnecessary time on issues and evidence developed in this case, and I did not spend

time on matters that were not relevant to the prosecution of this action.

**Market Rate**

I have been a member of the Texas Bar for over 28 years. I am also a member of numerous federal court bars. Throughout my career, my practice has focused on litigation in a variety of cases and forums. Because of my extensive experience litigating cases on behalf of poor Texans similar to the Taylor Plaintiffs, I was designated the Executive Director of Texas RioGrande Legal Aid effective January 6, 2018. I have attached my resume as Attachment No. 1 to this declaration. For this case, Plaintiffs ask that the Court adopt the USAO attorney's fees matrix, for 2015-2019 in light of recent fee awards in the Southern District of Texas, which are similar to the matrix index. Based on this matrix I am asking to be compensated at a rate of \$572 per hour.<sup>1</sup> Based on my knowledge of the prevailing market rates, I believe that my current rate for a case such as this case is between \$572 and \$600 per hour. This rate is supported by the expert opinion of Bill Edwards in his declaration filed with this motion. Therefore, the Taylor Plaintiffs request a rate of \$572 per hour for Robert Doggett's time in this action.

In addition, I have known Marinda Van Dalen for more than ten years. I have had the opportunity to litigate this case with Ms. Van Dalen, as my co-counsel, making me familiar with the high quality of her work. I am also familiar with Ms. Van Dalen's reputation in the legal community and know that she is both a skilled and respected member of the bar. In addition, I am familiar with the skills and quality of work of Jose Garza and other TRLA attorneys who assisted with the prosecution of this cause. Mr. Garza extremely knowledgeable regarding the type of litigation at issue here, was the lead counsel in the case for the Taylor Plaintiffs, is a well respected and skilled attorney and continues as TRLA's Litigation Director. Both of these lawyers are very skilled and produce a

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<sup>1</sup> The matrix indicates that rates for attorney's with 21-30 years of experience for 2018-19 is \$572.00 per hour. I had more than 21 years of experience in 2013 when this case began. The 2018-2019 rate is appropriate since there is necessarily, a substantial delay in the payment of fees from when the work was done.

high quality of work.

**Lodestar**

In determining the Lodestar a court should usually consider the actual hours devoted to the case and the market hourly rate for the lawyer in question. In my capacity as co-counsel for the Taylor set of Plaintiffs, I devoted over 300 hours to the successful prosecution of this cause and am requesting compensation for a reduced portion of those hours, totaling 146.8 hours. In addition, Mr. Edwards and Robert Doggett have both testified that a prevailing market rate commensurate with the matrix of the USAO of \$572.00 per hour, for someone of Mr. Robert Doggett's experience, in this case is reasonable. Therefore, the lodestar requested in this case for Robert Doggett is \$83,969.60 (146.8 hrs. x \$572 = \$83,969.60)

*Preclusion of Other Employment Assisting Poor Texans.* My work in this litigation restricted the time available for pursuit of other litigation at Texas RioGrande Legal Aid during the period of activity in this case. Because of the extensive work required in a time-compressed period of time, I was unable to accept and work on other cases where the clients are low income Texans in desperate need of legal assistance. My work on this case prevented me from assisting impoverished families facing an eviction, needing disaster assistance, or being denied food stamps.

*Time Limitation Imposed by Circumstances.* The time limitations in this case were imposed by pending election schedules and by the failure of the State Defendants to comply with the provisions of the Voting Rights Act in a timely manner.

*Undesirability of the Case.* This case was filed pursuant to the Voting Rights Act, 52 U.S.C.A. § 10301. Counsel for Plaintiff represents the Taylor set of Plaintiffs. This case is very undesirable because the expedited election schedule placed unusual time constraints on the development and preparation of the case and because of the specialized nature of the actions. Moreover, the case required significant time and resources to properly prosecute, and recovery of a fee

and expenses was contingent on success. Finally, even though success is now insured, recovering a reasonable fee is still remote in time. Working on a case of a contingent nature for over two years, without a reasonable fee thus also makes this case undesirable.

*Experience and Expertise.* My experience has included participation in federal litigation, extensive advocacy in state and federal administrative hearings, and preparation of pleadings, briefs and evidence for cases in both state and federal courts.

It is my opinion, based on my experience, on an contested award made for my services in another case, and upon inquiring of other lawyers, that the prevailing market rate for an attorney of over twenty-eight years of experience, in a difficult and complicated civil rights case is between \$572 and \$600 per hour.

*Results Obtained and other Enhancement Factors.* The results obtained in this case were precisely what the Plaintiffs requested as an appropriate remedy, injunctive relief, remedies to violations of Section 2 of the Voting Rights Act.

### **Costs**

Texas RioGrande Legal Aid (TRLA) incurred significant costs to successfully prosecute this action. They include expenses for necessary travel, filing fees, copying, postage, discovery costs, exhibit preparation, and the like. In addition, Plaintiffs request payment for expert costs associated with this case. The unreimbursed expenses for the TRLA in this case were **\$44,273.62**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Robert Doggett  
Robert Doggett

## **Robert W. Doggett**

### **Education**

J.D., Southern Methodist University, Top Quarter, May 1990

B.B.A., Texas A&M University, Cum Laude, May 1987

### **Experience**

Sept. 2001 - Present

#### **Texas RioGrande Legal Aid, Inc. (Austin, Texas)**

Jan. 2018 – present - *Executive Director*

Jan. 2012 – Dec. 2017 - *General Counsel*

Jan. 2001 – Jan. 2012 - *Team Manager, Foreclosure Defense*

Team focuses on the prevention of home loan foreclosures and unscrupulous lending practices. Member of other teams: Private Landlord-Tenant, Federally Subsidized Housing (e.g., vouchers, public housing), Colonias and Real Property. [Also engaged in significant litigation in a variety of other areas outside of housing.]

Aug. 1999 – Aug. 2001

#### **City of Dallas, City Attorney's Office (Dallas, Texas)**

*Section Chief*

Before a planned move from Dallas, the City Attorney requested I create and direct a section to improve conditions in slum multifamily properties. Rather than push criminal citations and quasi-judicial relief as had been done in the past, this section brought civil cases requesting injunctive relief on all violations upon filing suit. Court orders were obtained, by agreement or not, that required owners to remedy the violations within specific deadlines. To address burned out houses and dilapidated structures in forgotten neighborhoods, the section created and ran a new judicial procedure to remove these dangerous buildings expeditiously.

Aug. 1994 – Aug. 1999

#### **Legal Services of North Texas (Dallas, Texas)**

(merged with and now known as Legal Aid of North West Texas)

*Lead Attorney, Public Policy & Law Reform Section*

Represented low income groups in a variety of civil disputes (e.g., housing, environmental). Litigation initiated on behalf of these groups or individuals where issue affected low income people in a community.

Sept. 1990 – Aug. 1994

#### **Dallas Tenants Association (Dallas, Texas)**

(also known as the Housing Crisis Center)

*General Counsel* (only attorney)

Assisted low income individuals with housing disputes. Priorities included evictions, utility disconnections, and extreme living conditions. Supervised a tenant assistance hotline operated by staff and volunteers. Administered a *pro bono* advice and referral program which recruited, trained and organized private attorneys to provide free legal services to low income people.

### **Awards**

Impact Award, Poverty Law Section SBOT (2011)

Certificate of Outstanding Advocacy, SBOT (2009)

Houser Award, Texas Low Income Housing Information Service (2007)

Legal Assistance Award, Assn of Comm. Orgs for Reform Now (ACORN) (2007)

Golden Gavel Service Award, SMU Law (1996)

A.J. Thomas, Jr. Award for Outstanding Service, SMU Law (1990)

State Bar of Texas, Student Division, for Professionalism (1990)

Southern Methodist University Law School, Outstanding Service (1990)

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
[CASE ID VID07: Voter Identification]					
VID07 85B-IND-Electio	[COMM] Community Outreach	09/03/2013	16:03 - 20:03	[A1008] Robert W. Doggett	nc 4.0
	Visited community centers in Edna. Explained project to Victoria and Corpus offices.				
VID07 85B-IND-Electio	[TV] Travel	09/03/2013	20:04 - 00:04	[A1008] Robert W. Doggett	4.0
	From Austin to Edna, then Victoria office, then Corpus office (Pueblo).				
VID07 85B-IND-Electio	[TV] Travel	09/04/2013	16:12 - 00:12	[A1008] Robert W. Doggett	8.0
	Traveled from Corpus Office to Rockport Community Center, to Sinton office, to Beeville office, then Refugio Community Center, then Austin.				
VID07 85B-IND-Electio	[COMM] Community Outreach	09/04/2013	00:13 - 02:13	[A1008] Robert W. Doggett	2.0
	Visits to Senior Centers in Rockport and Refugio				
VID07 85B-IND-Electio	[T] Telephone call to...	09/23/2013	09:03 - 10:33	[A1008] Robert W. Doggett	nc 1.5
	looking for experts, call with Kevein Jewell, emails to UT Law Clinics (Heather and Kelly)				
VID07 85B-IND-Electio	[R] Research, Legal	09/24/2013	09:04 - 11:04	[A1008] Robert W. Doggett	2.0
	started reviewing cases on issue (e.g., Indiana case by SCOTUS called Crawford)				
VID07 85B-IND-Electio	[F] Facts investigation	10/28/2013	12:14 - 14:14	[A1008] Robert W. Doggett	nc 2.0
	articles on issue, research on 19th Amendment position				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/01/2013	12:20 - 13:20	[A1008] Robert W. Doggett	nc 1.0
	on clients for case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/18/2013	17:16 - 18:16	[A1008] Robert W. Doggett	nc 1.0
	attended call with other counsel to all the VID cases				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/19/2013	17:17 - 18:17	[A1008] Robert W. Doggett	nc 1.0
	attended call with co-counsel in Ortiz case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/19/2013	18:18 - 18:30	[A1008] Robert W. Doggett	nc 0.2
	to process server. Thinks there will be a problem with summons				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	11/20/2013	10:21 - 10:33	[A1008] Robert W. Doggett	nc 0.2
	obtained and sent revised summons to process server for service				
VID07 85B-IND-Electio	[T] Telephone call to...	11/20/2013	10:34 - 10:40	[A1008] Robert W. Doggett	nc 0.1
	JG. Will redo summons				
VID07 85B-IND-Electio	[C] Conference w/	11/22/2013	10:14 - 12:14	[A1008] Robert W. Doggett	2.0
	possible experts Jewell and Leeland.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	11/22/2013	12:15 - 12:45	[A1008] Robert W. Doggett	0.5
	to county election persons of three counties (Travis, Cameron, Hidalgo) requesting provisional ballot data. Follow ups. Call back from one same day to chat about it.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	12/02/2013	11:23 - 11:35	[A1008] Robert W. Doggett	nc 0.2
	confirmed engagement agreement with expert, Kevin Jewell.				
	Confirmed.				
	--Robert Doggett				
VID07 85B-IND-Electio	[TV] Travel	12/02/2013	11:36 - 14:36	[A1008] Robert W. Doggett	nc 3.0
	From Austin to SA and back to meet with possible expert in case.				
VID07 85B-IND-Electio	[C] Conference w/	12/02/2013	14:37 - 15:37	[A1008] Robert W. Doggett	nc 1.0
	with possible expert (Patricia Jaramillo) in SA office.				
VID07 85B-IND-Electio	[DP] Document - prepare	12/03/2013	16:17 - 16:23	[A1008] Robert W. Doggett	nc 0.1
	Request Form (Trust / Litigation Adv)				
VID07 85B-IND-Electio	[F] Facts investigation	12/04/2013	15:54 - 17:24	[A1008] Robert W. Doggett	1.5
	on provisional ballots. Requested more info from Travis. Discussion with VB on research project.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/03/2014	19:41 - 20:11	[A1008] Robert W. Doggett	0.5
	reviewed 12b response by other plaintiffs and KN's memo on ancil juris in prep for call				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/03/2014	20:12 - 20:30	[A1008] Robert W. Doggett	nc 0.3
	with JG, MVD and KN on process for responding to 12b, experts, and motion to consolidate				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/07/2014	15:08 - 16:08	[A1008] Robert W. Doggett	1.0
	Kevin and Marinda to go over basics of the case.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/07/2014	16:09 - 17:09	[A1008] Robert W. Doggett	1.0
	with Jose and Marinda and Katy Newell on response and expert plan				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/10/2014	15:09 - 17:39	[A1008] Robert W. Doggett	2.5
	reviewed draft response. MVD provided other briefs on standing issue so I submitted a new section that starts to answer the question.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/13/2014	14:58 - 15:58	[A1008] Robert W. Doggett	1.0
	with Kevin Jewell and MVD to go over plan to obtain info from clients. Kevin will develop interview questions and we will work with the clients to be able to answer them. Kevin plans to answer three questions. 1) How much out of pocket expenses? 2) How much for other expenses? 3) Impact of these costs on our plaintiffs compared to others. May want to look at tax returns.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/13/2014	15:59 - 16:05	[A1008] Robert W. Doggett	nc 0.1
	With JG, MVD, KN to go over response due today.				
VID07 85B-IND-Electio	[R] Research, Legal	01/13/2014	16:06 - 16:36	[A1008] Robert W. Doggett	0.5
	looked up cases cited by state in its 12b to distinguish and explain. Email to JG my answers:				
	Coon case cited in motion at 4 relates to a case where there was some crazy stuff going on in a town, shooting, fighting. Coon was hurt. Coon's wife and daughter sued for their own damages (not Coon's). That is where the 5th Cir stated: "Dana and Racheal Coon, like all persons who claim a deprivation of constitutional rights, were required to prove some violation of their personal rights."				
	Associational standing is a different animal.				
	=====				
	The State also drops: "Shaw v. Garrison, 545 F.2d 980 (5th Cir. 1977), rev'd on other grounds sub nom. Robertson v. Wegmann, 436 U.S. 584 (1978).				
	Rizzo is also inapplicable.				
VID07 85B-IND-Electio	[R] Research, Legal	0113/2014	16:37 - 17:07	[A1008] Robert W. Doggett	0.5
	state's motion. EM to JG on it:				
	Texas Motion, top of 3 references Domino's Pizza case.				
	That was a 1981 case (race case). The plaintiff was black. The contract with the defendant was with the plaintiff's business, not him.				
	"Consistent with our prior case law, and as required by the plain text of the statute, we hold that a plaintiff cannot state a claim under § 1981 unless he has (or would have) rights under the existing (or proposed) contract that he wishes "to make and enforce." Section 1981 plaintiffs must identify injuries flowing from a racially motivated breach of their own contractual relationship, not of someone else's."				
	The Plaintiff in our case is an association. Big difference. Edith Jones's opinion makes this clear. And 1981 case law is way different.				
	Moreover, referencing Domino's Pizza, the 5th Cir through out another case brought by an association for violation of 1981 and other statutes, but specifically noted that the association did not manage to				



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	<p>plead a 1983 case (clearly if it had, it might have stated a cause of action):</p> <p>"Although the Association presumably intended these allegations to be actionable under 42 U.S.C. § 1983 or 42 U.S.C. § 1985, they fall well short of stating viable civil rights claims. Accordingly, we find no error in the district court's decision to dismiss them."</p> <p>Grambling Univ. Nat'l Alumni Ass'n v. Bd. of Supervisors for the La. Sys., 286 Fed. Appx. 864, 870 (5th Cir. La. 2008)</p> <p>=====</p> <p>As Plaintiffs point out, the Fifth Circuit has addressed, and significantly distinguished, the Tenth Circuit's associational standing analysis in <i>Kansas Health Care</i>. See <i>Ass'n of Am. Physicians</i>, 627 F.3d at 552-53 (concluding individual participation not necessary in suit for declaratory and injunctive relief for alleged constitutional violations including medical board's use of anonymous complaints and retaliatory actions against physicians). In so doing, the Fifth Circuit made clear the distinction rested on whether the claims in a particular case required minimal factual development, such as allegations of administrative illegality, or were of a more fact-sensitive nature. <i>Id.</i> at 552. The Fifth Circuit agreed with the Third and Seventh Circuits, holding "as long as resolution of the claims benefits the association's members and the claims can be proven by evidence from representative injured members, without a fact-intensive-individual inquiry, the participation of those individual members will not thwart associational standing." <i>Id.</i></p> <p>In this case, Plaintiffs are not contending each individual pharmacy [**34] is entitled to a specific determination of its appropriate reimbursement rate. Rather, Plaintiffs are alleging claims based on lack of administrative oversight and violations of various statutes. Janek has not established Plaintiffs' claims require the type of individualized evidentiary consideration as those at issue in the <i>Kansas Health Care</i> case. n12 Accordingly, TrueCare does not lack standing to assert claims on behalf of its members.</p> <p><i>Pharm. Buying Assoc., Inc. v. Sebelius</i>, 906 F. Supp. 2d 604, 618 (W.D. Tex. 2012)</p>				
VID07 85B-IND-Electio	[R] Research, Legal	01/13/2014	17:08 - 18:08	[A1008] Robert W. Doggett	1.0
	<p>on best case to give court on 12b standing issue re 1983:</p> <p>What I sent to Marinda on Friday was just draft, but she said she put it in the response and sent it back to you. Anyway, if you would like, I can clean it up.</p> <p>For example, on the subsection on orgs using 1983 I found a recent Edith Jones quote from a 1983 case that should put that issue to rest:</p> <p>"There is no question that an association may have standing in its own right to seek judicial relief from injury to itself and to vindicate whatever rights and immunities the association itself may enjoy", but "[e]ven in the absence of injury to itself, an association may have standing solely as the representative of its members." <i>Warth v. Seldin</i>, 422 U.S. 490, 511, 95 S. Ct. 2197, 2211, 45 L. Ed. 2d 343 (1975). AAPS's standing here depends on its ability to sue for redress of its members' grievances. Thus,[A]n association has standing to bring suit on behalf of its members when: (a) its members would otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization's purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit. See <i>Hunt v. Wash. St. Apple Adver. Comm'n</i>, 432 U.S. 333, 343, 97 S. Ct. 2434, 2441, 53 L. Ed. 2d 383 (1977). The first two components of <i>Hunt</i> address [**7] constitutional requirements, while the third prong is solely prudential. See <i>United Food &amp; Commercial Workers Union Local 751 v. Brown Grp., Inc.</i>, 517 U.S. 544, 555, 116 S. Ct. 1529, 1535, 134 L. Ed. 2d</p>				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	<p>758 (1996).</p> <p>Beyond question, AAPS satisfies the first and second Hunt prongs. n2 As to [*551] the third prong, the Board argued that because AAPS's claims require the participation of individual members, it cannot meet that test. The district court agreed that AAPS's allegations about anonymous complaints, conflicts of interest, arbitrary administrative rulings, breaches of privacy, and retaliation cannot be sustained without the extensive participation of individual members and therefore render associational standing improper. We hold otherwise.</p> <p>Ass'n of Am. Physicians &amp; Surgs. v. Tex. Med. Bd., (TMB), 627 F.3d 547, 550-551 (5th Cir. Tex. 2010)</p>				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/13/2014	18:09 - 19:39	[A1008] Robert W. Doggett	1.5
	sent edits to latest version of response to JG.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	01/14/2014	11:45 - 12:15	[A1008] Robert W. Doggett	nc 0.5
	on interogs and pro hac app by K Newell				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/17/2014	11:53 - 12:53	[A1008] Robert W. Doggett	1.0
	with JG and MVD on scheduling, summer plan, experts, and open records issues				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/22/2014	11:46 - 12:58	[A1008] Robert W. Doggett	1.2
	with Kevin Jewell to talk about intake questions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/22/2014	12:59 - 13:59	[A1008] Robert W. Doggett	1.0
	with expert Kevin Jewell and MVD on questions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/28/2014	15:01 - 16:01	[A1008] Robert W. Doggett	1.0
	call with Kevin Jewell on progress of client interviews				
VID07 85B-IND-Electio	[TV] Travel	02/11/2014	21:02 - 01:02	[A1008] Robert W. Doggett	nc 4.0
	to CC for status conf with court				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/11/2014	01:03 - 03:03	[A1008] Robert W. Doggett	nc 2.0
	Prepared for court hearing on status. Meeting with counsel on case.				
VID07 85B-IND-Electio	[HG] Hearing	02/12/2014	21:04 - 23:04	[A1008] Robert W. Doggett	nc 2.0
	status conference				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/12/2014	23:05 - 00:05	[A1008] Robert W. Doggett	1.0
	Post hearing meeting with counsel.				
VID07 85B-IND-Electio	[F] Facts investigation	02/12/2014	00:06 - 01:06	[A1008] Robert W. Doggett	1.0
	Looked to make contact with client.				
VID07 85B-IND-Electio	[TV] Travel	02/12/2014	01:07 - 05:07	[A1008] Robert W. Doggett	nc 4.0
	from CC back to Austin				
VID07 85B-IND-Electio	[HG] Hearing	02/14/2014	21:15 - 22:15	[A1008] Robert W. Doggett	nc 1.0
	Appeared by telephone to listen to proceedings.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/24/2014	11:52 - 13:22	[A1008] Robert W. Doggett	1.5
	regarding docs needed for expert, call				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	02/27/2014	11:52 - 12:52	[A1008] Robert W. Doggett	nc 1.0
	on issues related to legislative privilege				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/03/2014	21:02 - 21:08	[A1008] Robert W. Doggett	nc 0.1
	between counsel regarding case				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/04/2014	14:53 - 15:17	[A1008] Robert W. Doggett	nc 0.4
	reviewed scheduling order changes being considered by P groups and explanations				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	03/21/2014	15:21 - 16:21	[A1008] Robert W. Doggett	1.0
	with Marinda, JG on plan for case, answering discovery questions, initial disclosures, depo planning, hearing coming up next week, expert issues				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/24/2014	10:03 - 10:15	[A1008] Robert W. Doggett	nc 0.2
	on possible volunteer counsel wanting to help us with case				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/24/2014	10:16 - 10:40	[A1008] Robert W. Doggett	nc 0.4
	regarding plan for hearing, new law firm offering assistance				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/25/2014	10:15 - 10:27	[A1008] Robert W. Doggett	0.2
	on depositions, 30(b)(6). How are we going to cover them all.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/25/2014	10:28 - 10:58	[A1008] Robert W. Doggett	0.5
	on RFPDs from state. Reviewed them.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/26/2014	10:16 - 10:22	[A1008] Robert W. Doggett	0.1
	on initial disclosures.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/26/2014	10:23 - 10:47	[A1008] Robert W. Doggett	nc 0.4
	modifications to themes for document production search terms (to add women issue)				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/31/2014	11:09 - 12:21	[A1008] Robert W. Doggett	1.2
	review of RFPD to our plaintiffs				
VID07 85B-IND-Electio	[TCC] Telephone Conference Cal	04/01/2014	08:37 - 10:07	[A1008] Robert W. Doggett	nc 1.5
	with judge on legislative privilege issues				
VID07 85B-IND-Electio	[T] Telephone call to...	04/01/2014	10:08 - 10:38	[A1008] Robert W. Doggett	0.5
	Marinda on issues with clients. Planning trip to Kenedy to visit client. Status of Ortiz, the client in Berclair, written discovery.				
VID07 85B-IND-Electio	[TV] Travel	04/03/2014	08:20 - 12:20	[A1008] Robert W. Doggett	4.0
	to Kenedy from Austin to visit with Lionel Estrada (client and plaintiff in case). It is 2 hours each way.				
VID07 85B-IND-Electio	[F] Facts investigation	04/03/2014	12:21 - 14:21	[A1008] Robert W. Doggett	2.0
	interviewed Lionel Estrada in Kenedy				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/04/2014	11:18 - 12:18	[A1008] Robert W. Doggett	1.0
	on issues after reviewing numerous emails:				
	1. Should we push de bene esse depositions of our clients? If I knew we could get our clients to trial, and they say it right, this would be powerful testimony. Those are two big ifs. Maybe we depose de bene esse the ones we know will be very hard to find and get to the courthouse.				
	If we want this, I think we need to be talking about it with everyone and get some agreements or bring it up at the next status conference with the judge.				
VID07 85B-IND-Electio	[DP] Document - prepare	04/04/2014	12:19 - 13:37	[A1008] Robert W. Doggett	1.3
	reviewing Estrada's declaration and for other facts from interview and docs after meeting with him in Kenedy.				
	Docs loaded into Dropbox.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/07/2014	08:22 - 09:22	[A1008] Robert W. Doggett	1.0
	with Jose and Marinda on how to handle production deadline, initial disclosures, trial depositions, adding an item to DPS depo				
VID07 85B-IND-Electio	[DP] Document - prepare	04/08/2014	08:18 - 09:18	[A1008] Robert W. Doggett	1.0
	Review and edit declaration of Lionel Estrada				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/08/2014	09:19 - 09:55	[A1008] Robert W. Doggett	nc 0.6
	with judge and parties re scheduling order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/08/2014	09:56 - 10:56	[A1008] Robert W. Doggett	1.0
	with Kevin, Marinda, Jose, Katy on plan for depositions, more facts from our clients				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/08/2014	10:57 - 11:21	[A1008] Robert W. Doggett	0.4
	to Plaintiff groups re request to add item to DPS depo. set issue for Thursday con calls.				
VID07 85B-IND-Electio	[TRAI] Training - attend	04/09/2014	11:20 - 12:20	[A1008] Robert W. Doggett	nc 1.0
	training on how to use the doc retrieval system (Crivella West)				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/10/2014	14:05 - 15:35	[A1008] Robert W. Doggett	nc 1.5
	regarding open record requests for Cameron, and others. Got data, sent to others on team				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/10/2014	15:36 - 16:00	[A1008] Robert W. Doggett	nc 0.4
	with Jose and Marinda on open records				
VID07 85B-IND-Electio	[F] Facts investigation	04/10/2014	16:01 - 17:01	[A1008] Robert W. Doggett	nc 1.0
	research on naming conventions				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/11/2014	11:22 - 12:52	[A1008] Robert W. Doggett	1.5
	Drafted discovery documents: call to go over objections to discovery requests from state (1st set)				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/15/2014	11:02 - 11:14	[A1008] Robert W. Doggett	0.2
	re Leonard Taylor's birth cert. Also the Crivella West training issue.				
VID07 85B-IND-Electio	[DP] Document - prepare	04/15/2014	11:15 - 12:45	[A1008] Robert W. Doggett	nc 1.5
	Lionel Estrada's declaration.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/15/2014	12:46 - 12:58	[A1008] Robert W. Doggett	0.2
	deposition schedule				
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters	04/15/2014	12:59 - 13:47	[A1008] Robert W. Doggett	nc 0.8
	created master calendar that all could use on the web to be updated in real time				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/15/2014	13:48 - 14:18	[A1008] Robert W. Doggett	0.5
	got with AB to start working on obj to RFPD				
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters	04/16/2014	09:20 - 10:50	[A1008] Robert W. Doggett	nc 1.5
	went through deadlines in case, and updated calendar, set up calendar to notify if changes				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/16/2014	10:51 - 11:21	[A1008] Robert W. Doggett	0.5
	regarding organizational RFPD from state and coordinating with other parties. Also, how we actually produce docs -- using specially designed transfers, Bates Stamping, etc.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/16/2014	11:22 - 12:04	[A1008] Robert W. Doggett	0.7
	reviewed RFPD to state by Veasey-LULAC. I think we should consider changes to the scope of the request. EM to our team				
VID07 85B-IND-Electio	[T] Telephone call to...	04/17/2014	14:08 - 14:38	[A1008] Robert W. Doggett	0.5
	Marinda on what we need to ask state -- moving deadlines, complying with electronic discovery requirements, and locating all discovery sent to state so we can see if holes				
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/21/2014	11:26 - 11:56	[A1008] Robert W. Doggett	0.5
	3rd request for production from state. Reviewed, and emailed co-counsel				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	04/22/2014	08:05 - 09:35	[A1008] Robert W. Doggett	1.5
	for SOS Ingram				
VID07 85B-IND-Electio	[DEP] Deposition - Take	04/23/2014	08:05 - 13:05	[A1008] Robert W. Doggett	nc 5.0
	Attended deposition of SOS e dir., Ingram				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/28/2014	08:16 - 09:04	[A1008] Robert W. Doggett	0.8
	Located and transmitted docs in my email responsive to the state's second request for production to the individual plaintiffs (sent to Marinda for compiling with other responsive docs).				
VID07 85B-IND-Electio	[T] Telephone call to...	04/28/2014	09:05 - 09:23	[A1008] Robert W. Doggett	0.3
	Marinda and I went over plan for week with discovery due.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/29/2014	15:40 - 19:40	[A1008] Robert W. Doggett	4.0
	Drafted discovery documents: responses and objections to state's first requests for production to individuals.				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/29/2014	19:41 - 21:41	[A1008] Robert W. Doggett	2.0
	Drafted discovery documents: [DESCRIBE] responses and objections to state's interrogatory and 2nd set of request for production to individuals.				
VID07 85B-IND-Electio	[DEP] Deposition - Take	04/30/2014	09:09 - 16:39	[A1008] Robert W. Doggett	7.5
	Attend and propounded questions to DPS rep Joe Peters. In Austin from 9-5. 30 min lunch.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/30/2014	16:40 - 17:10	[A1008] Robert W. Doggett	0.5
	got copy of opinion issued by judge denying restitution				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	09:43 - 10:01	[A1008] Robert W. Doggett	0.3
	Marinda on plan for finalizing responses to written discovery.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	10:02 - 10:08	[A1008] Robert W. Doggett	nc 0.1
	DGH on his thoughts on Leland and experts in light of Wis decision.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/01/2014	10:09 - 13:09	[A1008] Robert W. Doggett	3.0
	Drafted discovery documents: drafted responses to request for production (1st set)				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/01/2014	13:10 - 14:28	[A1008] Robert W. Doggett	1.3
	Drafted discovery documents: response to request for prod (2nd set) and one interrogatory				
VID07 85B-IND-Electio	[HG] Hearing	05/01/2014	14:29 - 15:23	[A1008] Robert W. Doggett	nc 0.9
	Hearing on motion to quash subpoenas sent to legislators				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	15:24 - 15:30	[A1008] Robert W. Doggett	0.1
	Dan Freeman DOJ on experts needed for trial and comparison to Wis case				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/02/2014	16:05 - 16:17	[A1008] Robert W. Doggett	nc 0.2
	concerning experts being retained by all parties (except DOJ)				
VID07 85B-IND-Electio	[DP] Document - prepare	05/02/2014	16:18 - 16:36	[A1008] Robert W. Doggett	nc 0.3
	edits to motion and order to withdraw Peter M, with email to opposing to confirm no objection.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/02/2014	16:37 - 16:55	[A1008] Robert W. Doggett	nc 0.3
	Leland about expert testimony he might be interested in doing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/05/2014	18:30 - 19:00	[A1008] Robert W. Doggett	nc 0.5
	review of 5th Cir case by True the Vote to stay or accelerate appeal. I am opposed to both, but they did not ask or officially notice the Ortiz plaintiffs through me (maybe Jose).				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/06/2014	18:31 - 18:55	[A1008] Robert W. Doggett	0.4
	and discussion with DOJ concerning their docs they got from the counties. We will get a disk with them by FedEx.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/06/2014	18:56 - 19:02	[A1008] Robert W. Doggett	0.1
	to Kevin Jewell re trial schedule so he can mark out days.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/06/2014	19:03 - 19:39	[A1008] Robert W. Doggett	0.6
	with Kevin Jewell				
VID07 85B-IND-Electio	[T] Telephone call to...	05/07/2014	18:35 - 19:05	[A1008] Robert W. Doggett	nc 0.5
	Marinda to discuss where we are with depositions of legislators				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/07/2014	19:06 - 19:24	[A1008] Robert W. Doggett	nc 0.3
	to Marinda after a phone call with DOJ: So Bruce with DOJ called me about the docs being produced by the counties (I called them because Jessica said she was very interested in these docs). He says Jose has been getting FedExes of them with CDs. I talked to him about getting some BBQ on his next visit to Austin,,, and he is going to send me one CD that might be particularly helpful, but not all of them I don't think. Maybe Katy could help sort through Jose's mail .....				
	We might also want to tell all parties to send stuff to you directly and avoid this problem going forward.				



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/07/2014	19:25 - 19:49	[A1008] Robert W. Doggett	0.4
	reviewed docs we are producing to Texas in response to discovery				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/07/2014	19:50 - 19:56	[A1008] Robert W. Doggett	nc 0.1
	documents that appear responsive, no objection, should produce. MVD requested DGH opinion.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/07/2014	19:57 - 20:09	[A1008] Robert W. Doggett	nc 0.2
	subpoenas for all the legislators issued				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/07/2014	20:10 - 20:58	[A1008] Robert W. Doggett	nc 0.8
	with Jessica expert				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/08/2014	18:43 - 19:13	[A1008] Robert W. Doggett	nc 0.5
	got draft of TLSC's pet for mandamus				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/08/2014	19:14 - 20:14	[A1008] Robert W. Doggett	nc 1.0
	with counsels for Plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/09/2014	18:43 - 19:13	[A1008] Robert W. Doggett	0.5
	email and calls to discuss what TRLA would do				
VID07 85B-IND-Electio	[DEP] Deposition - Take	05/09/2014	19:14 - 01:14	[A1008] Robert W. Doggett	nc 6.0
	of DHHSC in Price Daniel Building with Dan Freeman. John Scott defended.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/09/2014	01:15 - 01:45	[A1008] Robert W. Doggett	nc 0.5
	Leland to retain him and explain our plan.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/09/2014	01:46 - 02:10	[A1008] Robert W. Doggett	nc 0.4
	to MVD, DGH on plan for Leland and update on expert analysis by DOJ's people				
VID07 85B-IND-Electio	[C] Conference w/	05/09/2014	02:11 - 02:35	[A1008] Robert W. Doggett	0.4
	Dan Freeman of DOJ after depo to discuss concerns about expert witness data analysis				
VID07 85B-IND-Electio	[HG] Hearing	05/12/2014	18:49 - 19:49	[A1008] Robert W. Doggett	nc 1.0
	Telephone status hearing.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/12/2014	19:50 - 20:14	[A1008] Robert W. Doggett	nc 0.4
	letter from state conferring before motion to compel on production discovery				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/12/2014	20:15 - 20:45	[A1008] Robert W. Doggett	nc 0.5
	with DOJ, Leland, MVD on expert data analysis				
VID07 85B-IND-Electio	[HG] Hearing	05/15/2014	09:11 - 10:17	[A1008] Robert W. Doggett	nc 1.1
	Hearing on external campaign materials (quahsed), judicial notice of DOJ's report denied (w/o prejudice), length and process of trial -- judge is fine with two weeks, or more. Hearings will be set every 10 days going forward. Judge not moving trial.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/19/2014	12:15 - 12:39	[A1008] Robert W. Doggett	0.4
	with DOJ on county data. Sending me more disks by FedEx				
VID07 85B-IND-Electio	[DEP] Deposition - Take	05/20/2014	12:19 - 15:19	[A1008] Robert W. Doggett	nc 3.0
	Katherine Cesinger at Dechert				
VID07 85B-IND-Electio	[T] Telephone call to...	05/27/2014	08:10 - 08:28	[A1008] Robert W. Doggett	nc 0.3
	Mainrda. Plan for production supplement, depo prep.				
VID07 85B-IND-Electio	[HG] Hearing	05/28/2014	11:43 - 12:13	[A1008] Robert W. Doggett	nc 0.5
	Hearing on - status hearing on common interest doc (wants more briefing), depositions, release of data				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	12:14 - 12:44	[A1008] Robert W. Doggett	nc 0.5
	with state on data release. State objecting to giving us what DOJ got.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	12:45 - 13:45	[A1008] Robert W. Doggett	1.0
	among P groups on common interest, list of IDs, SB 14 definition, membership info from org clients				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	13:46 - 14:46	[A1008] Robert W. Doggett	nc 1.0
	prehearing call with Plaintiff groups				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[HG] Hearing	05/28/2014	14:47 - 14:53	[A1008] Robert W. Doggett	nc 0.1
	Hearing on data issue				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	11:48 - 12:48	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiff groups - common interest briefing, motion to quash legis depositions, membership issues, meeting regarding experts				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	12:49 - 13:19	[A1008] Robert W. Doggett	nc 0.5
	with Plaintiff groups and DOJ regarding data, experts, common interest				
VID07 85B-IND-Electio	TCC] Telephone Conference Call	05/29/2014	13:20 - 14:20	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiff Groups to go over:				
	> 1. Common interest briefing > > 2. Legislator deposition briefing/motions to transfer > > 3. Texas's subpoenaing of legislators' documents > > 4. Texas's document requests/agreements from meet and confer > > A. Membership lists -- See suggested draft stipulation below > > B. Contention discovery > > 5. Expert meeting with DOJ > > 6. Depositions of friendly legislators > > 7. Request for Admission responses 8. Status of affected person identification				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	14:21 - 15:21	[A1008] Robert W. Doggett	nc 1.0
	Call with DOJ and Plaintiff Groups:				
	1. Common interest 2. Databases 3. Experts, meeting to discuss 4. RFA call needed after hearing				
VID07 85B-IND-Electio	[R] Research, Legal	05/29/2014	15:22 - 16:34	[A1008] Robert W. Doggett	1.2
	on privilege questions that may be asked at depositions of our clients today, e.g., reason for getting an attorney, driving with expired license				
VID07 85B-IND-Electio	[HG] Hearing	05/30/2014	11:50 - 13:50	[A1008] Robert W. Doggett	nc 2.0
	Hearing on motion to quash subpoenas of legislations. Heard in person in Judge Sparks court. Judge transferred motions to Judge Ramos.				
VID07 85B-IND-Electio	[F] Facts investigation	06/02/2014	14:02 - 15:32	[A1008] Robert W. Doggett	nc 1.5
	got data from DOJ. Created receipt and disclosure for Leland, along with declarations and supporting material so he could analyze the data. Met him and gave him data.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/02/2014	15:33 - 15:51	[A1008] Robert W. Doggett	0.3
	I think this is agreeable. Call me to chat if you want.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	06/02/2014	15:52 - 16:34	[A1008] Robert W. Doggett	0.7
	Confer on issues with state:				
	Sorry this response is a couple hours later than you requested.				
	1. Our clients have produced and will continue to produce SB 14 supporting documents and birth certificate documents requested by the state in the discovery previously propounded and thus any alternative procedure is inapplicable. We will make every effort to produce them to the extent we have not already, two days prior to the deposition.				



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	<p>2. Regarding the SB 14 definition and the date issues, the our clients do not have any such documents, but will supplement if any are discovered.</p> <p>3. We are ok with the membership compromise being worked out with y'all and Ezra, and another issue you are working on with Chad. Please advise if this is still a problem.</p> <p>4. Please be advised that Belinda Ortiz has now obtained id that complies with SB 14. Also, that Leonard Taylor and Eulalio Mendez do not have certified copies of their birth certificates.</p> <p>Is there anything else you need from us?</p> <p>Robert Doggett</p> <p>On 5/29/2014 7:03 PM, Roscetti, Jennifer wrote:  &gt; Dear Counsel,  &gt;  &gt; I am emailing on behalf of Ms. Wolf to follow up regarding outstanding issues from our past teleconferences concerning Plaintiffs' responses to Defendants' Requests for Production.  &gt;  &gt; The first outstanding issue relates to Defendants providing a list of documents that individual Plaintiffs will then review to determine whether they have possession, custody, or control of the documents rather than having to produce all the requested materials. This is the category of documents Ms. Wolf refers to as "supporting documents" for obtaining an EIC, Driver License, or other form of identification. Defendants are actively compiling this list and plan to provide it to Plaintiffs on Friday, May 30, 2014 by 2:00 p.m. CST. Please confirm by 2:00 p.m. CST, on Monday, June 2, 2014 whether Plaintiffs approve of the Defendants' list and will agree to comply with this procedure instead of providing documents responsive to Defendants' requests for production.  &gt;  &gt; The next outstanding issue relates to what Ms. Wolf has previously referred to as "family member documents." Defendants have proposed the following procedure for the individual Plaintiffs who have not, or have been unable to produce their birth certificate. Defendants will provide a list of underlying documents that Plaintiffs' can review and affirm whether or not Plaintiffs have possession, custody, or control of documents relating to immediate family members that would allow those immediate family members to obtain a birth certificate for the Plaintiffs. Defendants will provide this list to Plaintiffs by Friday, May 30 at 2:00 p.m. CST for review. Defendants request confirmation by 2:00 p.m. CST, on Monday, June 2, 2014 whether or not Plaintiffs will approve of Defendants' proposed list and will agree to comply with this procedure rather than providing the documents responsive to Defendants' requests for production.  &gt;  &gt; Defendants would like to clarify that this procedure does not need to apply to (1) individual Plaintiffs who have not alleged that they lack forms of identification under SB 14 (i.e., politicians and community organizers); (2) individual voters who have alleged to have been disenfranchised who have either (a) produced a birth certificate, or (b) a form of identification which would be permissible for voting under SB 14. As a result, this approach would apply to: Peggy Draper Herman, Ken Gandy, John Mellor-Crummey, Koby Ozias, Gordon Benjamin, Belinda Ortiz, Lionel Estrada, and Margarito Martinez Lara. If any of these individuals are over 75 years of age, they also do not have to comply with this procedure. Defendants request confirmation that this procedure will be complied with (as well as whether any of these individuals are over 75 years of age, and are thus exempt) by 2:00 p.m. CST, on Monday, June 2, 2014.  &gt;  &gt;The third outstanding issue relates to Plaintiffs' objection to the definition of SB 14 and the date requirements under Defendants' requests. More specifically, Plaintiffs objected to producing any documents prior to January 2012 or that relate to any other previous voter id bill. It is Defendants' understanding that Plaintiffs are still confirming whether or not their clients are withholding documents</p>				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio					
<p>based on objections to the definition of SB 14 or the date of January 2012. Defendants request that Plaintiffs confirm, in writing, by 2:00 p.m. CST on Monday, June 2, 2014 whether or not documents have been searched for and been produced, or in the alternative, have been searched for and are being withheld.</p> <p>&gt;</p> <p>&gt; The next outstanding issue concerns Plaintiffs' objections to providing Defendants membership lists. As an alternative to the Plaintiff organizations producing a complete membership list, Defendants have proposed to Plaintiffs two options. These options include either (1) producing a list of members who Plaintiffs allege have been injured by SB 14; or (2) Plaintiffs providing a stipulation that the organization does not have the ability to respond to the request (without waiving any objections) because it does not maintain a membership record detailing which members possess the acceptable SB 14 identification. It is Defendants' understanding that Mr. Rosenberg is drafting the stipulation language, and that depending on the language the other organizational Plaintiffs will either use the stipulation procedure, or stand on their objections. Defendants request that Mr. Rosenberg provide the draft stipulation by 2:00 p.m. CST, on Monday, June 2, 2014. Defendants also request that the other Plaintiffs provide a definitive answer, in writing, as to whether or not this stipulation procedure will be an acceptable alternative to providing documents responsive to the requests for production by 2:00 p.m. CST, on Monday, June 2, 2014.</p> <p>&gt;</p> <p>&gt;The last issue relates to what has collectively been referred to as the "contention requests." Defendants' understanding is that the proposed procedure to handle responses to these contentions requests is to allow Plaintiffs to provide a global document response. More specifically, Plaintiffs would produce the documents that are responsive to the contention requests and rather than identifying each request the documents are responsive to, Plaintiffs would accompany the document production with a statement that Plaintiffs were not withholding documents that were responsive to the contention requests. Furthermore, it is our understanding that Mr. Dunn was working on the language for this statement, and while Mr. Dunn was not available for the May 27, 2014 meet and confer, Mr. Baron would consult with him regarding this issue. Defendants request that Plaintiffs provide a written procedure for handling this matter, including any proposed language regarding their productions, by 2:00 p.m. CST, on Monday, June 2, 2014</p> <p>&gt;</p> <p>&gt; Defendants are more than willing to work with the Plaintiffs on all these discovery issues, but unfortunately due to the imminent discovery deadlines we need written responses to ensure the progression of the conference process. If Defendants do not receive responses to these issues by the June 2 deadline, we will have to move forward with Motions to Compel.</p> <p>&gt;</p> <p>&gt;</p> <p>&gt; Sincerely,</p> <p>&gt;</p> <p>&gt;Jennifer M. Roscetti  &gt;Assistant Attorney General  &gt;Office of the Attorney General  &gt;Consumer Protection Division  &gt;300 W.15th Street, 9th Floor  &gt;Austin, Texas 78701  &gt;512.475.4183 (t)  &gt;512.473.8301 (f)</p> <p>&gt;</p> <p>&gt;-----Original Message-----  &gt; From: Wolf, Lindsey  &gt; Sent: Wednesday, May 28, 2014 9:43 AM  &gt; To: Robert Doggett (AUS); Ali, Hasan  &gt;Cc: Neil Baron; Rosenberg, Ezra; EXT Chad Dunn; EXT Armand Derfner; EXTLuis Vera Jr; EXT</p>					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	mvandalen; EXT Gerry Hebert; rhaygood@naacpldf.org; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; <a href="mailto:pnoriega@trla.org">pnoriega@trla.org</a> ; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; Conley, Danielle; Shordt, Richard; Paikin, Jonathan; Dunbar, Kelly P.; Sinzduk, Gerard; Lebsack, Sonya L; Eisenberg, Lynn; EXT EmmaSimson; anna.baldwin@usdoj.gov; <a href="mailto:robert.berman@usdoj.gov">robert.berman@usdoj.gov</a> ; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; <a href="mailto:avner.shapiro@usdoj.gov">avner.shapiro@usdoj.gov</a> ; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; <a href="mailto:john.a.smith@usdoj.gov">john.a.smith@usdoj.gov</a> ; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; Rudd, Amy; Yeary, Michelle; ttrainor@bmplp.com; jnixon@bmplp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; mposner@lawyerscommittee.org; EXT Sonia Gill; EXT Jose Garza; pmcgra w@trla.org; bdonnell@dakpc.com; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur > Subject: RE: Veasey v. Perry - Follow-Up Meet-and-Confer from Meet-and-Confer of Thursday, May 22 > > Thanks, counsel. I will assume any other representatives for the non-U.S. Plaintiffs and Plaintiff-Intervenors who would like to participate are also available at 1 P.M. CST, unless I hear otherwise.				
VID07 85B-IND-Electio	[T] Telephone call to...	06/02/2014	16:35 - 16:59	[A1008] Robert W. Doggett	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/03/2014	14:12 - 14:24	[A1008] Robert W. Doggett	0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/04/2014	14:05 - 14:17	[A1008] Robert W. Doggett	0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/05/2014	11:33 - 12:15	[A1008] Robert W. Doggett	0.7
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/05/2014	12:16 - 13:16	[A1008] Robert W. Doggett	nc 1.0
VID07 85B-IND-Electio	[HG] Hearing	06/06/2014	11:38 - 12:38	[A1008] Robert W. Doggett	nc 1.0
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/09/2014	11:44 - 12:14	[A1008] Robert W. Doggett	0.5
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/09/2014	12:15 - 13:03	[A1008] Robert W. Doggett	nc 0.8
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/09/2014	13:04 - 13:10	[A1008] Robert W. Doggett	nc 0.1
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	06/09/2014	13:11 - 13:41	[A1008] Robert W. Doggett	nc 0.5
VID07 85B-IND-Electio	[T] Telephone call to...	06/11/2014	12:12 - 12:54	[A1008] Robert W. Doggett	0.7
VID07 85B-IND-Electio	[T] Telephone call to...	06/11/2014	12:55 - 13:43	[A1008] Robert W. Doggett	0.8
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/12/2014	12:14 - 12:32	[A1008] Robert W. Doggett	0.3
VID07 85B-IND-Electio	[T] Telephone call to...	06/12/2014	12:33 - 12:57	[A1008] Robert W. Doggett	nc 0.4
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/12/2014	12:58 - 15:58	[A1008] Robert W. Doggett	nc 3.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/16/2014	11:58 - 13:58	[A1008] Robert W. Doggett	2.0
	reviewed and edited LUPE's objections to topics in its deposition. Sent copy to all counsel.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/16/2014	13:59 - 14:17	[A1008] Robert W. Doggett	0.3
	reviewed a brief to be filed on behalf of Ps to respond to State's request to obtain federal databases. Signed off.				
VID07 85B-IND-Electio	[T] Telephone call to...	06/16/2014	14:18 - 14:30	[A1008] Robert W. Doggett	0.2
	Kevin on financial inputs he was using for travel and other issues for his report				
VID07 85B-IND-Electio	[T] Telephone call to...	06/16/2014	14:31 - 14:43	[A1008] Robert W. Doggett	nc 0.2
	Wilmer Hale atty rep Plaintiffs to discuss their expert inputs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/17/2014	08:04 - 08:16	[A1008] Robert W. Doggett	nc 0.2
	on depo of written questions for Lara. Will be faster if client can do it at all.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/17/2014	08:17 - 08:35	[A1008] Robert W. Doggett	0.3
	regarding plan for depo of Estrada				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/18/2014	08:05 - 08:23	[A1008] Robert W. Doggett	nc 0.3
	on judicial notice of docs				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/18/2014	08:24 - 08:54	[A1008] Robert W. Doggett	nc 0.5
	Jessica's draft report -				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/18/2014	08:55 - 09:07	[A1008] Robert W. Doggett	0.2
	on admission of prior depositions (from prior case)				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/19/2014	08:08 - 09:08	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiffs' counsel, went over issues of the week				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/19/2014	09:09 - 09:45	[A1008] Robert W. Doggett	0.6
	with MVD and Kevin on what is left for report, and how to handle assumptions				
VID07 85B-IND-Electio	[T] Telephone call to...	06/20/2014	08:09 - 08:21	[A1008] Robert W. Doggett	0.2
	Kevin on latest with Estrada and plan for his declaration				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	08:09 - 08:45	[A1008] Robert W. Doggett	nc 0.6
	went over Leland's report on impact of SB 14 on women				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	08:46 - 09:10	[A1008] Robert W. Doggett	nc 0.4
	with attys from Wilmer Hale to discuss what Leland found in his analysis of data				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	09:11 - 09:29	[A1008] Robert W. Doggett	0.3
	Jessica on what is going on with provisional ballot analysis				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	09:30 - 09:48	[A1008] Robert W. Doggett	0.3
	with state to confer on their motion to compel interrogatory responses				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/24/2014	08:35 - 09:35	[A1008] Robert W. Doggett	1.0
	MVD on docs needed to support discovery, LUPE depo prep, Estrada prep for depo				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/24/2014	09:36 - 10:36	[A1008] Robert W. Doggett	1.0
	for Estrada depo				
VID07 85B-IND-Electio	[TV] Travel	06/25/2014	08:43 - 10:31	[A1008] Robert W. Doggett	1.8
	to Kenedy to meet with client (Lionel Estrada) before depo				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/25/2014	10:32 - 12:32	[A1008] Robert W. Doggett	2.0
	Prepared for deposition of - met with client in DQ and went over everything				
VID07 85B-IND-Electio	[DEP2] Deposition - Defend	06/26/2014	09:01 - 13:01	[A1008] Robert W. Doggett	4.0
	Lionel Estrada in Kenedy (Best Western)				
VID07 85B-IND-Electio	[DP] Document - prepare	06/26/2014	13:02 - 13:26	[A1008] Robert W. Doggett	0.4
	declaration of Estrada for him to sign				
VID07 85B-IND-Electio	[TV] Travel	06/26/2014	13:27 - 15:27	[A1008] Robert W. Doggett	2.0
	from Kenedy to Austin after depo				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/26/2014	15:28 - 15:46	[A1008] Robert W. Doggett	0.3
	with MVD on plan, and result of depo				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/27/2014	09:07 - 09:37	[A1008] Robert W. Doggett	0.5
	with Kevin and MVD on expert report				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/27/2014	09:38 - 09:50	[A1008] Robert W. Doggett	0.2
	with Kevin and Lionel Estrada to go over some details for Kevin's report				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/27/2014	09:51 - 10:03	[A1008] Robert W. Doggett	0.2
	sent declaration of Estrada to Kevin				
VID07 85B-IND-Electio	[DP] Document - prepare	06/27/2014	10:04 - 12:34	[A1008] Robert W. Doggett	2.5
	prepared designation of experts for Ortiz plaintiffs, and Kevin's report. Filed designation, and filed report under seal per court designation, and set up link to download report.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/03/2014	09:12 - 10:12	[A1008] Robert W. Doggett	nc 1.0
	started gathering and reviewing expert reports of plaintiffs				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	07/05/2014	09:12 - 10:12	[A1008] Robert W. Doggett	nc 1.0
	put expert reports in one spot, downloaded them, some amended from first version				
VID07 85B-IND-Electio	[T] Telephone call to...	07/14/2014	07:52 - 08:52	[A1008] Robert W. Doggett	1.0
	calls with MVD				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/14/2014	08:53 - 09:23	A1008] Robert W. Doggett	0.5
	with Plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/14/2014	09:24 - 09:54	[A1008] Robert W. Doggett	0.5
	on state's request for extension to provide expert reports.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/15/2014	07:53 - 08:53	[A1008] Robert W. Doggett	nc 1.0
	read and responded to more emails on extension req by state and other issues				
VID07 85B-IND-Electio	[C] Conference w/	07/15/2014	08:54 - 09:18	[A1008] Robert W. Doggett	nc 0.4
	with MR on state's motion to compel, she will work on first draft				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/15/2014	09:19 - 10:19	[A1008] Robert W. Doggett	nc 1.0
	more emails and filings reviewed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/16/2014	07:54 - 08:00	[A1008] Robert W. Doggett	nc 0.1
	emails reviewed and filings				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/17/2014	07:55 - 08:55	[A1008] Robert W. Doggett	nc 1.0
	with plaintiffs				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/17/2014	08:56 - 09:26	[A1008] Robert W. Doggett	0.5
	state's answer to our complaint, discussion				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/17/2014	09:27 - 09:51	[A1008] Robert W. Doggett	0.4
	to state on resolving motion to compel				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/17/2014	09:52 - 10:52	[A1008] Robert W. Doggett	nc 1.0
	Plaintiffs weekly call				
VID07 85B-IND-Electio	[T] Telephone call to...	07/18/2014	07:56 - 08:44	[A1008] Robert W. Doggett	0.8
	on Taylor issue (convicted of felony), but ok, he did not vote while on probation, etc.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/18/2014	08:45 - 09:33	[A1008] Robert W. Doggett	0.8
	post mort on Taylor (depo suspended)				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/18/2014	09:34 - 10:16	[A1008] Robert W. Doggett	0.7
	reviewed first draft of response to state's motion to compel				
VID07 85B-IND-Electio	[R] Research, Legal	07/21/2014	07:58 - 09:58	[A1008] Robert W. Doggett	2.0
	trying to find better cases in support of response to motion to compel				
VID07 85B-IND-Electio	[DP] Document - prepare	07/21/2014	09:59 - 11:59	[A1008] Robert W. Doggett	2.0
	editing of response to motion to compel in light of comments and cases				



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	09:15 - 10:15	[A1008] Robert W. Doggett	1.0
	with plaintiffs on records and other issues				
VID07 85B-IND-Electio	[FILE] Filing	07/21/2014	11:60 - 12:30	[A1008] Robert W. Doggett	0.5
	filed response to motion to compel, exhibit need to be under seal, sent copies around				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/23/2014	08:00 - 09:00	[A1008] Robert W. Doggett	nc 1.0
	on missing records state just discovered				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/24/2014	08:01 - 08:13	[A1008] Robert W. Doggett	0.2
	with state on trying to resolve motion to compel				
VID07 85B-IND-Electio	[HG] Hearing	07/24/2014	08:14 - 09:14	A1008] Robert W. Doggett	1.0
	Hearing on discovery issues. Motion to compel against our clients was passed so the parties can continue to confer. Records issue discussed but no motions and no rulings.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	09:15 - 10:15	A1008] Robert W. Doggett	1.0
	with plaintiffs on records and other issues				
VID07 85B-IND-Electio	[HG] Hearing	07/24/2014	10:16 - 11:16	[A1008] Robert W. Doggett	1.0
	Hearing on - status hearing.				
	Minute Entry for proceedings held before Judge Nelva Gonzales Ramos. STATUS CONFERENCE held on 7/24/2014. Arguments heard re: [276] United States Motion for Protective Order. Court makes rulings on the record. Written order to be entered. Parties have reach an agreement on [335] Motion for Protection. Motion terminated. Arguments heard re: [355] United States Motion for Protective Order. Court GRANTS [355] Motion. Parties continue to confer on [343] Defendants Motion to Compel. Court does not hear arguments or make a ruling at this time. Argument heard re: [395] Motion to Compel. Court GRANTS [395] Motion. Parties have reach an agreement on [420] Plaintiffs Motion to Compel. Motion terminated. Parties continue to confer on [431] Defendants Advisory. Court does not hear arguments or make a ruling at this time. Status conference set for July 31, 2014 at 10:00 a.m. Status Conference set for 7/31/2014 at 10:00 AM before Judge Nelva Gonzales Ramos Appearances:John Crawford. Natasha Korgaonkar, Kelly Dunbar, Chad W Dunn, Kembel Scott Brazil, J Gerald Hebert, Armand Derfner, Robert W Doggett, Marinda Van Dalen, John Barret Scott, Lindsey Elizabeth Wolf, John Reed Clay, Jr, Arthur D'Andrea, Ben Addison Donnell, Ezra D Rosenberg, Bradley E Heard, Anna Baldwin, Emma P Simson.(Digital # 8:59-10:19)(ERO:G. Rogan), filed.(bcortez, 2)				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	11:17 - 11:53	[A1008] Robert W. Doggett	nc 0.6
	with plaintiffs' counsels				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	08:03 - 09:03	[A1008] Robert W. Doggett	nc 1.0
	emails and filings reviewed, forwarded, discussed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	09:04 - 09:22	[A1008] Robert W. Doggett	0.3
	update sent to experts on records and expert reports				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	09:23 - 09:47	[A1008] Robert W. Doggett	0.4
	on FF/CL. I want to wait to see which of our clients will testify before we do them and look at format they want.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/31/2014	14:50 - 15:02	[A1008] Robert W. Doggett	0.2
	MVD on what's left to do.				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	07/31/2014	15:03 - 15:09	[A1008] Robert W. Doggett	nc 0.1
	on new data. EM to Leland and DGH.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/01/2014	10:09 - 10:27	[A1008] Robert W. Doggett	0.3
	scheduling order amendments discussed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/01/2014	10:28 - 10:58	[A1008] Robert W. Doggett	0.5
	concerning Jewell depo				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/02/2014	14:20 - 14:50	[A1008] Robert W. Doggett	0.5
	state's expert reports, reviewed, filed, distributed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/02/2014	14:51 - 15:03	[A1008] Robert W. Doggett	0.2
	to KJ about depo				
VID07 85B-IND-Electio	[TF] Telephone call from	08/04/2014	07:51 - 08:15	[A1008] Robert W. Doggett	0.4
	Jose G. Went over where we are, what's left to do. Email too.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/05/2014	17:21 - 17:51	[A1008] Robert W. Doggett	nc 0.5
	and TC with MVD on plan for meeting with Ps counsel in DC. Review of emails re discovery disputes.				
VID07 85B-IND-Electio	[T] Telephone call to...	08/06/2014	16:01 - 16:25	[A1008] Robert W. Doggett	0.4
	MVD on plan for our clients for trial, which to testify				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	08/06/2014	16:26 - 16:50	[A1008] Robert W. Doggett	0.4
	case relating emails and filings reviewed				
VID07 85B-IND-Electio	[HG] Hearing	08/06/2014	16:51 - 17:51	A1008] Robert W. Doggett	nc 1.0
	Hearing, status, discovery issues - including voter fraud, information relied on by experts				
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/06/2014	17:52 - 18:04	[A1008] Robert W. Doggett	0.2
	on stipulation for LUPE. We should not agree to it.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	10:10 - 10:28	[A1008] Robert W. Doggett	0.3
	concerning expert depo schedule				
VID07 85B-IND-Electio	[DEP2] Deposition - Defend	08/15/2014	08:18 - 11:18	[A1008] Robert W. Doggett	3.0
	Jewell's depo				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/16/2014	08:16 - 09:16	[A1008] Robert W. Doggett	1.0
	on case, call with MVD				
VID07 85B-IND-Electio	[F] Facts investigation	08/16/2014	09:17 - 11:47	[A1008] Robert W. Doggett	2.5
	reviewed transcripts from LUPE depositions, first and second case, exhibits, etc.				
VID07 85B-IND-Electio	[DP] Document - prepare	08/17/2014	08:16 - 10:16	[A1008] Robert W. Doggett	2.0
	drafted FF for LUPE. Call with MVD.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	08/18/2014	08:15 - 10:45	[A1008] Robert W. Doggett	2.5
	with interest party plaintiff counsel. Went over each possible witness.				
VID07 85B-IND-Electio	[T] Telephone call to...	08/18/2014	10:46 - 11:28	[A1008] Robert W. Doggett	0.7
	with MVD to go over what we have left to do.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/19/2014	08:56 - 09:08	[A1008] Robert W. Doggett	0.2
	re designation of transcripts				
VID07 85B-IND-Electio	[TV] Travel	09/21/2014	11:19 - 14:19	[A1008] Robert W. Doggett	3.0
	to CC for closing arg prep, etc.				
VID07 85B-IND-Electio	[TP] Trial, prep	09/21/2014	14:20 - 15:50	[A1008] Robert W. Doggett	1.5
	prep for closing arg				
VID07 85B-IND-Electio	[TL] Trial	09/22/2014	11:20 - 15:20	[A1008] Robert W. Doggett	4.0
	closing arg				
VID07 85B-IND-Electio	[DOC] Document - receive/review	10/11/2014	11:06 - 16:06	[A1008] Robert W. Doggett	nc 5.0
	response to mandamus, motion for stay by state				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	12/16/2014	13:09 - 14:09	[A1008] Robert W. Doggett	nc 1.0
	on appeal plan				
VID07 85B-IND-Electio	[F] Facts investigation	02/12/2015	11:19 - 12:37	[A1008] Robert W. Doggett	nc 1.3
	research bills impacting voter id				
VID07 85B-IND-Electio	[F] Facts investigation	02/13/2015	11:19 - 12:49	[A1008] Robert W. Doggett	nc 1.5
	more research on bill filed in Texas relating to voter id, report prepared and sent out to co-counsel				



**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/13/2015	12:50 - 14:02	[A1008] Robert W. Doggett	nc 1.2
	with co-counsel and DOJ, etc. on briefing issues				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/20/2015	12:46 - 13:46	[A1008] Robert W. Doggett	nc 1.0
	with private Ps' counsels and DOJ on contents of various BOMs				
VID07 85B-IND-Electio	[F] Facts investigation	02/22/2015	13:46 - 14:46	[A1008] Robert W. Doggett	nc 1.0
	reviewed recent filings for bills that impact case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/26/2015	10:05 - 11:05	[A1008] Robert W. Doggett	nc 1.0
	on brief				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/23/2015	11:14 - 11:44	[A1008] Robert W. Doggett	nc 0.5
	re oral argument				
VID07 85B-IND-Electio	[T] Telephone call to...	03/23/2015	11:45 - 12:03	[A1008] Robert W. Doggett	nc 0.3
	MVD on latest in case, oral argument, travel plans.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/09/2015	15:23 - 15:29	[A1008] Robert W. Doggett	nc 0.1
	client called. Called him back. Has issue with SS disability. Been denied.				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	08/21/2015	11:14 - 11:38	[A1008] Robert W. Doggett	nc 0.4
	reviewed emails on motions, and meeting				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/26/2015	14:53 - 15:11	[A1008] Robert W. Doggett	nc 0.3
	on parameters of a settlement discussion on interim relief. Wanted to suggest clarification of what an affidavit should look like if needed to vote only with a registration card.				
VID07 85B-IND-Electio	[M] Mediation	08/27/2015	14:45 - 18:45	[A1008] Robert W. Doggett	nc 4.0
	attendance at a settlement conference in Austin re temp relief				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/28/2015	14:44 - 15:08	[A1008] Robert W. Doggett	nc 0.4
	regarding consent to stay pending cert, opposed				
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/29/2015	11:11 - 11:53	[A1008] Robert W. Doggett	nc 0.7
	reviewed motions, took positions in consultation				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/31/2015	14:44 - 15:02	[A1008] Robert W. Doggett	nc 0.3
	on case re motion for en banc consideration				
VID07 85B-IND-Electio	[DOC] Document - receive/review	09/02/2015	14:30 - 15:00	[A1008] Robert W. Doggett	nc 0.5
	review of reply on motion for remand and edits begun. Mooted out because 5th Cir ruled that motions should be carried forward until en banc rehearing request is resolved. Reviewed emails among parties regarding issue and whether a reply should be filed anyway, and when such a filing would be appropriate.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	09/03/2015	10:39 - 11:03	[A1008] Robert W. Doggett	nc 0.4
	on reply brief on motion to enter relief pending mandate. Reviewed multiple emails on subject and suggested changes.				
VID07 85B-IND-Electio	[TF] Telephone call from....	12/21/2015	17:25 - 17:37	[A1008] Robert W. Doggett	nc 0.2
	Natasha on letter she wants to send to 5th Cir on upcoming elections				
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/21/2015	17:38 - 17:44	[A1008] Robert W. Doggett	nc 0.1
	letter from private plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	12/21/2015	17:45 - 17:51	[A1008] Robert W. Doggett	nc 0.1
	to Natasha approving our clients to be in support of the letter to the 5th Cir				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	02/01/2016	18:59 - 19:11	[A1008] Robert W. Doggett	nc 0.2
	on whether to go to SCOTUS. I say no. Asking for thoughts from our side.				
VID07 85B-IND-Electio	[R] Research, Legal	02/05/2016	11:30 - 12:24	[A1008] Robert W. Doggett	nc 0.9
	researched all cases by SCOTUS on delay caused by circuit courts, threats of mandamus, etc.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/08/2016	19:14 - 20:02	[A1008] Robert W. Doggett	nc 0.8
	with MVD and JG with Chad on his thoughts about SCOTUS relief on failure of 5th to rule on anything				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/09/2016	19:13 - 21:25	[A1008] Robert W. Doggett	nc 2.2
	with private plaintiffs on whether and how to go to SCOTUS if 5th does not rule				
VID07 85B-IND-Electio	[R] Research, Legal	02/09/2016	21:26 - 21:56	[A1008] Robert W. Doggett	nc 0.5
	cases on emergency relief in SCOTUS, and rules, and local rules in 5th on emergency motions, email private plaintiffs. Mistake to call this an emergency motion.				
VID07 85B-IND-Electio	[R] Research, Legal	02/10/2016	18:40 - 18:52	[A1008] Robert W. Doggett	nc 0.2
	recent SCOTUS case on redistricting, and delay, and activity before the primary				
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/15/2016	:31 - 16:49	[A1008] Robert W. Doggett	nc 1.3
	reviewed docket in 5th in prep for UT Civil rights class. Research on amicus filed in VID to send to Gary Bledsoe.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/16/2016	11:27 - 13:15	[A1008] Robert W. Doggett	nc 1.8
	with our side on latest				
VID07 85B-IND-Electio	[F] Facts investigation	02/16/2016	13:16 - 14:46	[A1008] Robert W. Doggett	nc 1.5
	research lege issues, and looking at concordance				
VID07 85B-IND-Electio	[TRAI] Training - attend	02/18/2016	11:30 - 13:30	[A1008] Robert W. Doggett	nc 2.0
	law school presentation on case, presentation, travel, spoke				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/08/2016	12:09 - 12:33	[A1008] Robert W. Doggett	nc 0.4
	on whether to join another motion in the 5th, I am against				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/10/2016	12:08 - 12:20	[A1008] Robert W. Doggett	nc 0.2
	on what to do about en ban deadlines				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/21/2016	11:21 - 12:09	[A1008] Robert W. Doggett	nc 0.8
	with Ps on plan				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/21/2016	12:10 - 12:22	[A1008] Robert W. Doggett	nc 0.2
	scheduling order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	11:20 - 12:32	[A1008] Robert W. Doggett	nc 1.2
	two calls -- one with state, and then one among Ps on interim relief				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	07/22/2016	12:33 - 13:03	[A1008] Robert W. Doggett	nc 0.5
	on possible interim relief				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	13:04 - 13:34	[A1008] Robert W. Doggett	nc 0.5
	with Ps counsel again on interim relief				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	13:35 - 13:47	[A1008] Robert W. Doggett	nc 0.2
	offer from state - affidavit and instructions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	13:48 - 14:12	[A1008] Robert W. Doggett	nc 0.4
	with state on remdial order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	14:13 - 14:43	[A1008] Robert W. Doggett	nc 0.5
	on the motion for interim relief for HD 120 election with Ps				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	14:44 - 16:20	[A1008] Robert W. Doggett	nc 1.6
	with court on emergency relief. Two. Then two more. I lost count.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	16:21 - 16:51	[A1008] Robert W. Doggett	nc 0.5
	reviewed motion from state on interim relief and suggested changes				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	16:52 - 17:22	[A1008] Robert W. Doggett	nc 0.5
	still another call				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	17:23 - 17:59	[A1008] Robert W. Doggett	nc 0.6
	review proposals				
VID07 85B-IND-Electio	[TCC] Telephone Conference Cal	07/22/2016	17:60 - 18:30	[A1008] Robert W. Doggett	nc 0.5
	another call				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/23/2016	11:24 - 14:24	[A1008] Robert W. Doggett	nc 3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review	11/28/2016	10:57 - 11:39	[A1008] Robert W. Doggett	nc 0.7
VID07 85B-IND-Electio	[TF] Telephone call from....	01/18/2017	17:52 - 18:04	[A1008] Robert W. Doggett	nc 0.2
VID07 85B-IND-Electio	[EM] Email, Draft / Send	01/20/2017	17:53 - 18:23	[A1008] Robert W. Doggett	nc 0.5
VID07 85B-IND-Electio	[HG] Hearing	01/20/2017	18:24 - 18:36	[A1008] Robert W. Doggett	nc 0.2
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	01/23/2017	17:03 - 17:21	[A1008] Robert W. Doggett	nc 0.3
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/06/2017	17:08 - 17:20	[A1008] Robert W. Doggett	nc 0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/22/2017	08:44 - 09:44	[A1008] Robert W. Doggett	nc 1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/22/2017	09:45 - 09:57	[A1008] Robert W. Doggett	nc 0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/24/2017	10:34 - 10:40	[A1008] Robert W. Doggett	nc 0.1
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/24/2017	10:41 - 10:47	[A1008] Robert W. Doggett	nc 0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/24/2017	10:48 - 10:54	[A1008] Robert W. Doggett	nc 0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/20/2017	11:16 - 11:34	[A1008] Robert W. Doggett	nc 0.3
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/11/2017	11:56 - 12:50	[A1008] Robert W. Doggett	nc 0.9
VID07 85B-IND-Electio	[R] Research, Legal	04/12/2017	09:55 - 11:25	[A1008] Robert W. Doggett	nc 1.5
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/13/2017	09:54 - 10:42	[A1008] Robert W. Doggett	nc 0.8
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/18/2017	15:19 - 15:31	[A1008] Robert W. Doggett	nc 0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/24/2017	16:38 - 16:56	[A1008] Robert W. Doggett	nc 0.3
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/12/2017	12:07 - 13:19	[A1008] Robert W. Doggett	nc 1.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/15/2017	14:19 - 15:01	[A1008] Robert W. Doggett	nc 0.7
VID07 85B-IND-Electio	[R] Research, Legal	05/27/2017	07:21 - 07:51	[A1008] Robert W. Doggett	nc 0.5
VID07 85B-IND-Electio	[R] Research, Legal	05/27/2017	07:52 - 08:22	[A1008] Robert W. Doggett	nc 0.5
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/30/2017	16:41 - 16:53	[A1008] Robert W. Doggett	nc 0.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC= ROBERT W. DOGGETT**

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/07/2017	14:41 - 15:41	[A1008] Robert W. Doggett	nc 1.0
	status conference with court and parties				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/12/2017	15:02 - 15:32	[A1008] Robert W. Doggett	nc 0.5
	reviewed for edits brief from P's on scheduling				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/21/2017	17:40 - 17:46	[A1008] Robert W. Doggett	nc 0.1
	on scheduling next con on remedies briefing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/26/2017	07:31 - 07:43	[A1008] Robert W. Doggett	nc 0.2
	reviewed email to send to opp, sent comments				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/28/2017	17:26 - 17:44	[A1008] Robert W. Doggett	nc 0.3
	motion re education materials, reviewed				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/24/2017	18:37 - 18:43	[A1008] Robert W. Doggett	nc 0.1
	advisory filed by US, responding to previous advisories				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	08/28/2017	09:25 - 10:07	[A1008] Robert W. Doggett	nc 0.7
	with advocates on 3(c) relief				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	09/25/2017	06:53 - 07:35	[A1008] Robert W. Doggett	nc 0.7
	with advocates on issues on appeal				
VID07 85B-IND-Electio	[DOC] Document - receive/review	10/31/2017	16:45 - 17:03	[A1008] Robert W. Doggett	nc 0.3
	reviewed recent filings				

VID07 TOTAL: 300.9

After Billing Judgment Discount: 149.0

<b>REPORT TOTAL:</b>	<b>149.0</b>
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149.0 hrs. @ \$613.00 = \$91,337.00

## **TAYLOR EXHIBIT 4**

**TAYLOR PLAINTIFFS (TRLA) OUT OF POCKET EXPENSES  
VEASEY, et al. v. ABBOTT, et al.**

**Filing fee and process service fee:**

11-21-13: filing fee -	\$400.00
12-12-13: process service fee -	\$190.00
Total:	<b>\$590.00</b>

**Expert Expenses:**

**Testifying expert -**

<b>Kevin Jewell -</b>	trial prep and trial fees -	\$24,312.72
	Deposition prep and depo -	\$750.00
subTotal:		\$25,062.72

**Consulting expert –**

<b>Leland Beatty -</b>	\$10,000.00
Total:	<b>\$35,062.72</b>

**Travel expenses for client outreach and communication:**

**9-3-13 through 9-4-13**

<b>Robert Doggett –</b>	Mileage 522m @ \$.45 =	\$234.90
	Meals	\$60.00
	Lodging (1night)	\$119.60

**5-21-14 through 6-19-14**

<b>Priscilla Noriega –</b>	Mileage office to Raymondville and Sebastian	\$136.80
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**12-10-13 through 12-11-13**

<b>Jose Garza</b>	Mileage 631 m @ \$.45 =	\$283.95
	Meals	\$60.00
	Lodging	\$84.80

**12-17-13 through 12-18-13**

<b>Jose Garza</b>	Mileage 587 m @ \$.45 =	\$264.26
	Meals	\$60.00
	Lodging	\$89.27

**6-25-14**

<b>Robert Doggett</b>	Mileage 400m @ \$.45 =	\$180.60
	Meals	\$30.00
	Lodging	\$160.95

**5-8-17**

<b>Jose Garza</b>	Airfare	\$203.98
	Cab	\$19.00
	Meals	\$30.00
	Lodging	\$102.33

Total:		<b>\$2,120.44</b>
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**Travel expenses for depositions, ct. hearings and trial:****2-11-14**

<b>Jose Garza</b>	Mileage 305m @ \$.45 =	\$137.25
	Meals	\$30.00
	Lodging	\$114.95

**2-11-14**

<b>Marinda van Dalen</b>	Mileage 388m @ \$.45 =	\$174.60
	Meals	\$30.00
	Lodging	no charge

**2-11-14**

<b>Robert Doggett</b>	Mileage 434m @ \$.45 =	\$195.30
	Meals	\$30.00
	Lodging	no charge

**3-4-14 through 3-6-14 (includes travel for client meetings)**

<b>Jose Garza</b>	Mileage 594m @ \$.45 =	\$267.30
	Meals	\$60.00
	Lodging (2 nights)	\$254.26



**3-31-14**

<b>Jose Garza</b>	Mileage 308m @ \$.45 =	\$138.60
	Meals	\$30.00
	Lodging	\$126.55

**3-31-14**

<b>Marinda van Dalen</b>	Mileage 388m @ \$.45 =	\$174.60
	Meals	\$30.00
	Lodging	no charge

**5-30-14**

<b>Marinda van Dalen</b>	Mileage 330m @ \$.45 =	\$148.50
	Meals	\$30.00
	Lodging	\$90.85

**7-17-14 through 7-18-14 (LTaylor depo)**

<b>Marinda van Dalen</b>	Car Rental	\$53.48
	Meals	\$60.00
	Lodging	\$87.74

**8-26-14 through 9-10-14 (Trial)**

<b>Marinda van Dalen</b>	Car Rental	\$484.00
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**8-30-14 through 9-10-14 (Trial)**

<b>Marinda van Dalen</b>	Car Rental	\$411.76
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**9-4-14 through 9-5-14 (Trial)**

<b>Paula Garza</b>	Car Rental (transport client)	\$134.62
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**8-26-14 (Trial prep)**

<b>Robert Doggett</b>	Car Rental	\$75.28
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**9-1-14 (9 nights) (Trial)**

<b>Marinda van Dalen</b>	Lodging for expert, clients, and Ms. van Dalen	\$1,770.26
	Meals	\$830.00

**12-4-17 through 12-5-17 (oral argument)**

<b>Jose Garza</b>	Airfare	\$146.96
	Meals	\$60.00

Cab	\$36.00
Lodging	\$88.60
Airport parking	\$24.00

Total:	<b>\$6,325.46</b>
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**Other Trial Expenses**

Interpretation costs for E. Mendez	<b>\$175.00</b>
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<b>Total out of pocket costs and expenses:</b>	<b>\$44,273.62</b>
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## **TAYLOR EXHIBIT 5**

**TAYLOR PLAINTIFFS (TRLA) SUMMARY OF OUT OF POCKET  
EXPENSES**

**VEASEY, et al. v. ABBOTT, et al.**

<b>Filing fee and process service fee:</b>	<b>\$590.00</b>
<b>Expert Expenses:</b>	<b>\$35,062.72</b>
<b>Travel expenses for client outreach and communication:</b>	<b>\$2,120.44</b>
<b>Travel expenses for depositions, ct. hearings and trial:</b>	<b>\$6,325.46</b>
<b>Other Trial Expenses (interpreter):</b>	<b>\$175.00</b>
<b>TOTAL:</b>	<b>\$44,273.62</b>

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

**ORDER AWARDING ATTORNEYS' FEES AND COSTS TO TAYLOR PLAINTIFFS**

1. The Taylor Plaintiffs', represented by lawyers with Texas RioGrande Legal Aid, Inc., Motion for Attorneys' Fees and Costs is pending before this Court. Pursuant to 52 U.S.C.A. § 10310(e) and 42 U.S.C.A. § 1988, Plaintiffs have asked this Court for an award of attorneys' fees and costs. This was an action seeking redress for violations of Section 2 of the Voting Rights Act, 52 U.S.C.A. § 10301, as amended, 2006. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 52 U.S.C.A. § 10310(e), as amended 2006 as well as 42 U.S.C.A. § 1988.

2. The Supreme Court has determined that civil rights plaintiffs are prevailing parties "if they succeed on any significant issue in litigation which achieves some of the benefit the parties sought in bringing the suit." *Texas State Teachers Association v. Garland Independent School District*, 489 U.S. 782, 789, 109 S.Ct. 1486, 103 L.Ed.2d 866 (1989). In other words, "the plaintiff must be able to point to a resolution of the dispute which changes the legal relationship between [it] and the defendant," *Texas State Teachers*, 489 U.S. at 792.

3. Taylor Plaintiffs' attorneys, Jose Garza, Marinda Van Dalen and Robert Doggett<sup>1</sup>

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<sup>1</sup> The Taylor plaintiffs also relied on the assistance of various other TRLA staff attorneys and paralegals, but in the exercise of billing judgment, are not requesting fees for their time on this case.

presented pleadings, evidence, including witness testimony and argument to this Court, challenging the 2011 voter photo ID provisions enacted by the State of Texas (commonly referred to as S.B. 14). Their presentation was effective and demonstrated the skill necessary for the successful prosecution of this cause.

4. Ultimately, the challenged enactment was enjoined and a remedy imposed by this Court, because of violations of Section 2 of the Voting Rights Act, and affirmed by the *en banc* Fifth Circuit. A review of Plaintiffs' pleadings, attachments and argument in this case together with this Court's orders, including orders regarding the interim relief, as well as final judgment, demonstrate Plaintiffs' position as prevailing party in this action.

### **LODESTAR**

5. In determining the amount of fees, a court should "(1) ascertain the nature and extent of the services supplied by the attorney, (2) value the services according to the customary fee and quality of the legal work, and (3) adjust the compensation on the basis of the other *Johnson* factors that may be of significance in the particular case." *Alberti v. Klevenhagen*, 927 F.2d 927, 930 (5th Cir. 1990) (quoting *Leroy v. City of Houston*, 831 F.2d 576, 583 n.11 (5th Cir. 1987), *cert. denied*, 486 U.S. 1008 (1988)). Applications for attorneys' fees in the Fifth Circuit are analyzed using the "lodestar" method, a multi-step analysis to determine (1) the reasonable hourly rate for the attorneys who worked on the case; (2) the number of hours reasonably expended on the litigation by each attorney; and (3) adjustment of the amount based on a number of relative factors. *See Rouse v. Target Corp.*, 181 F.Supp.3d 379, 384 (S.D. Tex. 2016). The court begins by establishing the reasonable hourly rates and the number of hours reasonably expended; the court then calculates the "lodestar" amount by multiplying the reasonable hourly billing rate for each attorney by the number of hours reasonably expended on the litigation by that attorney. *Rouse*, 181 F.Supp.3d at 384; *Heidtman v. Cnty. of El Paso*, 171 F.3d 1038, 1043 (5th Cir. 1999).

6 As detailed more thoroughly in the supporting declarations (exhibits 1, 2 and 3 - declarations for Jose Garza, Marinda van Dalen and Robert Doggett) the Taylor Plaintiffs seek the following attorney's fees and costs as prevailing party in this action:

Attorneys' Fees requested:

Jose Garza <sup>2</sup>	472.9hrs.	x	\$613.00 =	\$289,887.70
Marinda Van Dalen <sup>3</sup>	1159hrs.	x	\$544.00 =	\$630,496.00
Robert Doggett <sup>4</sup>	146.8hrs.	x	\$572.00 =	\$83,969.60

7. The Defendants oversimplify the course of these proceedings, and under value the necessity of the time devoted by the Plaintiff and its counsel to the important issues that faced this Court. After a careful review of the complete record of this case the Court finds the hours documented were reasonable to present and prosecute this case. In addition, it is significant that the Taylor Plaintiffs' counsel have discounted significant time for the very issues raised by the Defendants.

8 After determining the number of compensable hours, the court "selects an appropriate hourly rate based on prevailing community standards for attorneys of similar experience in similar cases." *Id.* at 938 (quoting *Sims v. Jefferson Downs Racing Ass'n.*, 778 F.2d 1068, 1084 (5th Cir. 1985)). The court also should examine the particular circumstances of the case to determine if the rate or hours should be modified.

9. In this case, one of the biggest challenges imposed on the attorneys and this Court was the time constraints. In addition, this Court was dealing with the challenge of the interplay between varying sorts of data and competing interpretations. Expert testimony was critical in

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<sup>2</sup> Exhibit No. 1 to this motion is the Declaration of Jose Garza. This declaration includes exhibits detailing his qualifications as well as his daily time records. The declaration and its exhibits show that Mr. Garza devoted almost 800 hours to the prosecution of this case. Moreover, it shows a billing judgment reduction of over 300 hours, leaving the 472.9 hours claimed here.

<sup>3</sup> Exhibit No. 2 to his motion is the Declaration of Marinda van Dalen. Her declaration includes exhibits detailing her qualifications, as well as her daily time records. The declaration and its exhibits show that Ms. van Dalen devoted almost 1400 hours to the prosecution of this case. A billing judgment discount of over 230 has been applied leaving 1159 hours claimed.

<sup>4</sup> Exhibit No. 3 to this motion is the Declaration of Robert Doggett. His declaration includes exhibits that detail his qualifications and his daily time records. The declaration and exhibits detail a billing judgment discount of over 154 hours. Therefore, the Taylor Plaintiffs request an award of attorney's fees for 146.8 hours for Mr. Doggett's time in this case.



determining the impact of the law. Moreover, the most vulnerable of our population were the most impacted and providing that their circumstance be clearly articulated and determined was a key feature of the presentation by the Taylor Plaintiffs' counsel.

10. In support of its fee motion the Plaintiff has submitted declarations from the lawyers claiming fees setting out their opinion of their market rates and testifying that an appropriate hourly rate for attorneys of the experience and expertise of Plaintiff's counsel, ranges from \$250 per hour to just over \$600.00 per hour and in some instances over \$700 per hour and specifically testifying that in their opinion the rates requested for the lawyers in this case are appropriate. In addition, Plaintiffs submitted the expert declaration of Mr. William (Billy) Edwards, who testified to the reasonableness of the rates requested.

11. Therefore, based on the evidence presented and the record of this case, this Court awards the Taylor Plaintiffs attorneys fees as follows:

Jose Garza	472.9hrs.	@	\$613	=	\$289,887.70
Marinda Van Dalen	1159hrs.	@	\$544	=	\$630,496.00
Robert Doggett	146.8hrs.	@	\$572	=	\$83,969.60

In total, the Taylor Plaintiffs are awarded attorneys' fees in the amount of \$1,004,353.30.

### **COSTS**

Plaintiffs are also entitled to the costs of litigation, including expert witness costs. In this case costs included such items as filing fees, deposition costs and travel expenses. The Court finds after reviewing the relevant evidence presented that the following are the reasonable costs associated with prosecuting this case for the Taylor Plaintiffs:

Filing fee and process service fee:	\$590.00
Expert Expenses:	\$35,062.72
Travel expenses for client outreach and communication:	\$2,120.44
Travel expenses for depositions, ct. hearings and trial:	\$6,325.46
Other Trial Expenses (interpreter):	\$175.00

TOTAL: \$44,273.62

**FINAL AWARD**

Based on the foregoing, the relevant pleadings and the exhibits this Court finds that the Taylor Plaintiffs are prevailing party entitled to an award of reasonable attorneys' fees. The Court therefore, awards the Taylor Plaintiffs reasonable attorneys' fees and costs as follows:

Attorneys' fees – \$1,004,353.30  
Out of pocket and expert costs - \$44,273.62

**Total fees and costs - \$1,048,626.92**

Therefore, based on the arguments of the parties, pleadings and evidence presented to the Court, it is the opinion of the Court that Taylor Plaintiffs' Motion for Attorney's Fees and Costs should and is hereby GRANTED and Taylor Plaintiffs are AWARDED a reasonable attorneys' fee as described above.

It is therefore further ORDERED that the Defendant, tender to Plaintiffs attorneys, the above set out attorneys' fees and costs with interest from the date of this order.

In the event Plaintiff has not received payment as set out above, in 90 days from entry of this Order, execution shall issue.

ENTERED THIS DAY OF , 2019.

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UNITED STATES DISTRICT JUDGE